

**CHARGE SHEET
REVISED**Chester L. Logan
Chief of Police

To: Chief of Police Chester L. Logan

Date: May 7, 2013

PAGE 7 OF 22

DA# 12-0137

Name:	Rank:	Badge No.	COMMAND
JEROME COLLINS	POLICE OFFICER	1508	EASTERN DISTRICT

Specification 23: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on March 3, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 24: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on March 10, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 25: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on March 11, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 26: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on March 16, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.


JOHN SERDA

Commander

Disciplinary Administration

FOR USE AT COMMANDER'S HEARINGS ONLY

Hearing Officer: _____ Hearing Date: _____

Verdict: _____ Sentence: _____

Other Members Present: _____

**CHARGE SHEET
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DA# 12-0137

Name:	Rank:	Badge No.	COMMAND
JEROME COLLINS	POLICE OFFICER	1508	EASTERN DISTRICT

Specification 35: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on May 7, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.

Specification 36: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on May 8, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.

Specification 37: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on May 13, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.

Specification 38: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on May 14, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.


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DA# 12-0137

Name:	Rank:	Badge No.	COMMAND
JEROME COLLINS	POLICE OFFICER	1508	EASTERN DISTRICT

Specification 39: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on May 15, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 40: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on May 20, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 41: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on May 28, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 42: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on June 5, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.


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Name:	Rank:	Badge No.	COMMAND
JEROME COLLINS	POLICE OFFICER	1508	EASTERN DISTRICT

Specification 43: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on June 29, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.

Specification 44: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on June 30, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.

Specification 45: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on July 1, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.

Specification 46: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on July 2, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.


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Name:	Rank:	Badge No.	COMMAND
JEROME COLLINS	POLICE OFFICER	1508	EASTERN DISTRICT

Specification 47: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on July 8, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 48: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on July 10, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 49: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on July 14, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 50: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on July 15, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.


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Name:	Rank:	Badge No.	COMMAND
JEROME COLLINS	POLICE OFFICER	1508	EASTERN DISTRICT

Specification 51: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on July 17, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.

Specification 52: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on July 22, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.

Specification 53: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on July 23, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.

Specification 54: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on July 24, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.


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JEROME COLLINS	POLICE OFFICER	1508	EASTERN DISTRICT

Specification 55: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on July 29, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 56: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on July 30, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 57: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on August 3, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 58: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on August 5, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.


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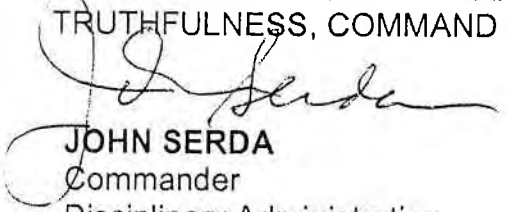
Name:	Rank:	Badge No.	COMMAND
JEROME COLLINS	POLICE OFFICER	1508	EASTERN DISTRICT

Specification 59: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on August 7, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 60: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on August 21, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 61: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on August 25, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 62: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on August 27, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.


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PAGE 17 OF 22

To: Chief of Police Chester L. Logan

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Name:	Rank:	Badge No.	COMMAND
JEROME COLLINS	POLICE OFFICER	1508	EASTERN DISTRICT

Specification 63: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on August 28, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 64: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on September 2, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 65: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on September 14, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 66: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on September 15, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.


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Name:	Rank:	Badge No.	COMMAND
JEROME COLLINS	POLICE OFFICER	1508	EASTERN DISTRICT

Specification 67: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on September 21, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 68: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on September 23, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 69: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on September 24, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 70: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on September 29, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.


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JEROME COLLINS	POLICE OFFICER	1508	EASTERN DISTRICT

Specification 71: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on September 30, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 72: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on October 2, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 73: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on October 22, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 74: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on October 23, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.


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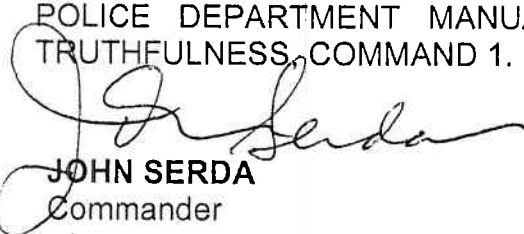
Name:	Rank:	Badge No.	COMMAND
JEROME COLLINS	POLICE OFFICER	1508	EASTERN DISTRICT

Specification 75: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on October 27, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.

Specification 76: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on October 29, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.

Specification 77: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on October 30, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.

Specification 78: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on November 16, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.


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Specification 79: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on November 17, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.

Specification 80: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on November 18, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.

Specification 81: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on November 19, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.

Specification 82: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on November 20, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 - 7.22 TRUTHFULNESS, COMMAND 1.


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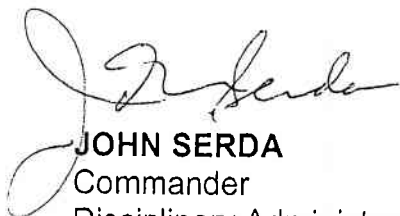
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Name:	Rank:	Badge No.	COMMAND
JEROME COLLINS	POLICE OFFICER	1508	EASTERN DISTRICT

Specification 83: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on November 23, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 84: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on November 24, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

Specification 85: That he, POLICE OFFICER JEROME COLLINS, badge 1508, currently assigned to Eastern District, **did on November 25, 2009**, willfully make a false written report, when he completed and submitted an Activity Log that he knew contained false information, THIS BEING IN VIOLATION OF THE DETROIT POLICE DEPARTMENT MANUAL SERIES 100, DIRECTIVE 102.3 – 7.22 TRUTHFULNESS, COMMAND 1.

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Subject: **RESCHEDULING OF POLICE TRIAL BOARD IN THE MATTER OF POLICE
OFFICER JEROME COLLINS, BADGE 1508, ASSIGNED TO EASTERN
DISTRICT
DISCIPLINE FILE NO. 12-0137**

From: Commander John Serda, Disciplinary Administration

COMPLIMENTARY COPIES

Detroit Police Officer's Association
Goldpaugh and Associates

CITY OF DETROIT
TRIAL BOARD HEARING

In the Matter of:
CITY OF DETROIT
(POLICE DEPARTMENT),

Employer,

No. 12-0137

-and-

Volume 3

DETROIT POLICE OFFICERS ASSOCIATION
(POLICE OFFICER JEROME COLLINS),
Union.

Proceedings had and testimony
taken in the above matter before a Trial Board at 7310
Woodward Ave., 3rd Floor, Detroit, Michigan, on
Tuesday, July 9, 2013 commencing at or about 9:00 a.m.
APPEARANCES:

TRIAL BOARD

COMMANDER ROBERT ENNIS, Chairperson

INSPECTOR GARY SROKA, Co-Member

INSPECTOR DWAYNE BLACKMON, Co-Member

MS. LETITIA JONES, ESQUIRE, City Advocate
(Appearing on behalf of the Detroit Police Department)

MR. JOHN GOLDPAUGH, ESQUIRE
(Appearing on behalf of Police Officer Jerome Collins)

REPORTED BY: TAMARA A. O'CONNOR (CSMR-2656, CER-2656)

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EXHIBITS

IDENTIFIED RECEIVED

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18		testimony	39	40
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Detroit, Michigan
Tuesday, July 9, 2013
9:21 a.m.

PROCEEDINGS

(JX#13 marked off the record)

COMMANDER ENNIS: This Trial

Board is reconvened today, Tuesday, July 9, 2013.

If there are no preliminary matters pending, would
you please continue with the proceedings, Ms. Jones?

MS. JONES: Yes. There is one
preliminary matter. Former Chief Godbee is
unavailable. We have submitted his testimony
through the transcript as Exhibit No. 13, and I
believe I have a stipulation to that.

MR. GOLDPAUGH: That is
correct. I discussed the matter with my client,
Officer Collins, and we would agree that we will
stipulate to his testimony from the previous
hearing.

MS. JONES: That previous
hearing was the suspension without pay, the
arbitration of the grievance of the suspension
without pay hearing.

COMMANDER ENNIS: And that will
be Exhibit No. 13?

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MS. JONES: Yes, sir.

COMMANDER ENNIS: It will be
admitted, Exhibit No. 13.

MS. JONES: Thank you.
(At 9:26 a.m., JX#13
received)

MS. JONES: The Department will
call Joyce Motley. Have a seat and take the stand,
please. Can the witness be sworn?

UNIDENTIFIED: Raise your right
hand. Do you swear or affirm that the testimony you
are about to give this Board is the truth?

MS. MOTLEY: I do.

JOYCE MOTLEY

(At 9:26 a.m., sworn as a witness, testified
as follows)

DIRECT EXAMINATION

BY MS. JONES:

Q Please make sure to speak up because your testimony
is being recorded. Make sure that your responses
are verbal, no um-ums and uh-huhs, because we need
either a yes or no or a verbal response.

A Yes, ma'am.

Q Thank you. Would you please state your name for the
record?

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A Joyce Motley.

Q Where are you employed?

A I'm retired.

Q Retired from where?

A The Detroit Police Department.

Q What was your position at the Detroit Police
Department prior to your retirement?

A I was a Deputy Chief.

Q Did you ever work at the Eastern District?

A Yes, ma'am.

Q Were you involved in any capacity with the Community
Relations Unit?

A Well, they worked for me.

Q Do you know what their assignments were from day to
day?

A I looked at the daily detail, yes, and the sergeant
briefed me sometimes.

Q As it relates to Mr. Collins, do you know Officer
Collins?

A Yes.

Q How do you know him?

A He worked for me at the Eastern District.

Q Were you aware of any request for outside employment
submitted by Officer Collins?

A No.

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Q Did Assistant Chief Godbee advise or did the Chief
at that time, either Ella Bully-Cummings or Warren
Evans, advise you that Officer Collins was to report
to them directly and not to the people in Eastern
District?

A I never worked for Chief Warren Evans, and Chief
Bully-Cummings never advised me of that.

Q So based on that, would it be fair to say that he
was to report to whoever the sergeant in charge was?

MR. GOLDPAUGH: I'm going to
object, it calls for speculation. She can only
testify as to what she knows or what--

Q (By Ms. Jones) If you know.

A As far as I know, while working for me, he reported
to his sergeant, not to me.

Q At any time, did you advise the sergeant that
Officer Collins could have slide time or anything
similar to what-- well, first of all, do you know
what slide time is?

A Yes.

Q Can you describe what slide time is for us?

A When you allow a person to leave early without
deducting court time.

Q At any time, did you allow him or tell Sergeant
Mattie Lewis that you were in charge of Collins and

4 (Pages 39 to 42)

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1 not her?
 2 A No.
 3 Q Did you tell Officer Collins that he could have
 4 slide time at any time?
 5 A No.
 6 Q If an officer had to work late-- because it is my
 7 understanding that the Community Relations Unit,
 8 sometimes they would work evenings and go to
 9 community meetings or what have you.
 10 If they had to work late, were
 11 they required to complete, when you were there, an
 12 activity log?
 13 A Everybody is required to complete an activity log.
 14 Q If they worked late, would they have to reflect
 15 that, or would they reflect what was on the daily
 16 detail?
 17 A It should have been reflected on the activity log.
 18 Q Whatever hours they worked?
 19 A Correct.
 20 MS. JONES: Nothing further of
 21 this witness. Pass to Mr. Goldpaugh.
 22 CROSS-EXAMINATION
 23 BY MR. GOLDPAUGH:
 24 Q Good morning.
 25 A Good morning, sir.

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1 Q The time frame that we're talking about when you
 2 were at the Eastern District, what years were those,
 3 please?
 4 A I believe it was 2007 through September 2008 I
 5 think.
 6 Q So approximately a year?
 7 A About a year, maybe a little longer.
 8 Q You succeeded now retired Chief Godbee. Is that
 9 correct?
 10 A That is correct.
 11 Q Were you aware of any relationship or any
 12 conversations that either-- I'm sorry. When you
 13 arrived, was Sergeant Mattie Lewis over Community
 14 Relations at that time?
 15 A Yes.
 16 Q So when you arrived, did you make any changes as to
 17 who was running Community Relations or anything
 18 along those lines?
 19 A No.
 20 Q So you just let it go, not in a derogatory sense,
 21 you just let it go the way it was going. Is that
 22 correct?
 23 A I let everybody stay in the same position.
 24 Q That was because everybody was doing their job and
 25 everything was getting taken care of. Would that be

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1 correct?
 2 A Sergeant Lewis was handling everything.
 3 Q When you spoke to Sergeant Lewis, did you have a
 4 meeting with Sergeant Lewis and speak to her
 5 regarding the members that were on the unit?
 6 A I'm sure I did.
 7 Q At that point in time, did you ever have a
 8 conversation with her indicating that Officer
 9 Collins was supposed to report to you or to Godbee
 10 or anybody like that?
 11 A No.
 12 Q When you spoke to Sergeant Lewis, did she have any
 13 type of a discussion regarding wanting to change the
 14 hours for Community Relations?
 15 A Not that I can remember.
 16 Q Did she give you any type of situation where she
 17 said, look, I can't be here on these particular
 18 hours because of the hours I work, and I want to
 19 change the Community Relations hours for the
 20 officers so that I can control them in that way?
 21 You don't have any recollection of that
 22 conversation?
 23 A No. I never told her I wanted to change the hours.
 24 I mean she had to change the hours for a meeting or
 25 something.

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1 Q Then you left in 2008, and who succeeded you if you
 2 recall?
 3 A I don't know.
 4 Q When you were there, Commander Dolunt worked for
 5 you. Is that correct?
 6 A That is correct.
 7 Q When did Commander Dolunt work for you, if you
 8 recall?
 9 A I believe it was 2008 till I left. I'm not sure
 10 what month he came.
 11 Q Was he there when you arrived?
 12 A No.
 13 Q So he came after that?
 14 A Correct.
 15 Q Then also you had James Moore. Is that correct?
 16 A Correct.
 17 Q Did either of them raise any concerns regarding the
 18 hours of Community Relations while you were there?
 19 A Not that I can remember.
 20 Q Did Commander Dolunt raise concerns specifically
 21 regarding Jerome Collins?
 22 A Not that I can remember.
 23 Q Just for my edification and for the Board as well,
 24 as a member of the Community Relations Unit, what
 25 did they do?

5 (Pages 43 to 46)

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1 A They ran community meetings, did programs at the
2 schools, helped with the national night out, helped
3 plant flowers around the precinct, ran the monthly
4 meeting with the community.
5 Q When you were there, was there a concern regarding
6 the number of B and Es that was ongoing everywhere
7 but particularly in the Eastern District?
8 MS. JONES: Objection,
9 relevance.
10 MR. GOLDPAUGH: It goes to one
11 of the obligations--
12 COMMANDER ENNIS: Overruled.
13 THE WITNESS: Yes, there was
14 concern about the B and Es.
15 Q (By Mr. Goldpaugh) Was part of the Community
16 Relations officers' responsibilities to go out when
17 people made reports about B and Es to verify and
18 follow up on those things, not to do an
19 investigation but to make sure they were being
20 treated properly so to speak?
21 A I don't remember them doing that.
22 Q Okay. Do you recall any type of a conversation that
23 you had with Commander Dolunt when he first arrived
24 there regarding Officer Collins?
25 A No, I don't.

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1 Q Do you remember any type of a conversation that
2 Commander Dolunt brought to your attention what
3 Jerome Collins was doing as part of the Community
4 Relations Unit, and you told him don't worry about
5 it, keep your hands off it, it's our responsibility?
6 A No. I'm not saying we didn't have it, but I don't
7 remember it.
8 Q But if you had that type of a discussion, what would
9 you have meant by keep your hands off of-- and I
10 don't mean that the way it came out with respect to
11 Officer Collins, but that it was our responsibility.
12 What would you have meant by that if that is what
13 you said?
14 MS. JONES: Objection. She
15 indicated she did not recall that conversation.
16 MR. GOLDPAUGH: I agree, she
17 said she didn't recall. She didn't say it didn't
18 occur. So therefore, I was asking her if she said
19 something like that, what did she mean by that?
20 MS. JONES: Calls for
21 speculation.
22 COMMANDER ENNIS: That's a
23 stretch. I will sustain the objection.
24 Q (By Mr. Goldpaugh) Was there any type of
25 conversation that you might have had with either

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1 Commander Dolunt, James Moore or Mattie Lewis
2 regarding any type of outside employment by Officer
3 Collins?
4 A I never had any conversation with anybody about
5 outside employment that I recall.
6 Q Do you recall ever having a meeting with Commander
7 Moore at the time along with Sergeant Lewis
8 regarding Officer Collins and his whereabouts during
9 the day?
10 A No. You will have to refresh my memory. I don't
11 remember that.
12 Q Do you recall any type of a conversation with
13 Commander Moore and the sergeant indicating that we
14 don't see Officer Collins as often as we see the
15 other members and you telling them don't worry about
16 it, I've got it covered?
17 A No.
18 Q You left there in 2008. Is that correct?
19 A I believe so.
20 Q Was it the responsibility of Community Relations to
21 do activity logs during that period of time?
22 A Correct.
23 Q They would have been confirmed and signed by the
24 sergeants or whoever was supervising. Is that
25 correct?

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1 A That's correct.
2 Q Now, was there a specific roll call for Community
3 Relations officers?
4 A I don't believe so.
5 Q Because this was under our general or under
6 anybody's general purview. So the officers just
7 came in, checked in with whoever they were checking
8 in with and then would go off and do their jobs. Is
9 that correct?
10 A I think so.
11 Q Would it be a fair statement, and I'm talking
12 generalities now, the officers pretty much ran their
13 own little community programs? Would that be a fair
14 statement?
15 A Under the supervision of the sergeant, that would be
16 a fair statement.
17 Q I know that part of their responsibilities would be
18 to check school crossings, check certain schools.
19 Is that correct?
20 A That's correct.
21 Q So I'm assuming that each-- how many Community
22 Relations officers did you have at that time if you
23 recall?
24 A I don't remember.
25 Q But there was more than just Jerome Collins?

6 (Pages 47 to 50)

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- 1 A Correct.
 2 Q Probably five or six at least?
 3 A That's a good estimate.
 4 Q So those schools, for example, in your particular
 5 precinct or in the district would be divvied up
 6 between the officers to check on. Would that be a
 7 fair statement?
 8 A That's a fair statement.
 9 Q So they would be checking when schools are getting
 10 out and things like that. That is part of their
 11 responsibilities. Correct?
 12 A Correct.
 13 Q Other than that, the community meetings and stuff
 14 that they were involved in, that was pretty much on
 15 their own schedule. Is that right?
 16 A It was on the service schedule.
 17 Q Meetings in the different areas sometimes went well
 18 beyond 8:00 at night, wouldn't they?
 19 A Yes.
 20 Q The officers were expected to be there and do their
 21 job. Correct?
 22 A Correct.
 23 Q Even if they were starting at noon. Correct?
 24 A That's correct.
 25 Q Of course, they would get no overtime for Community

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- 1 Relations, would they?
 2 A They got overtime.
 3 Q How did they get overtime?
 4 A Well, they got paid overtime. Some people took pay,
 5 some people took time. I mean their starting time
 6 may have varied, they didn't always start at the
 7 same time. I think it depended on what time their
 8 meeting was.
 9 Q I understand, but you said some of them took time,
 10 some of them took money. So by taking time, you
 11 mean slide time. Correct?
 12 A No. I meant comp time.
 13 MR. GOLDPAUGH: I have no other
 14 questions of this witness.
 15 MS. JONES: I have just a few
 16 based on some of the questions that were asked by
 17 counsel.
 18 REDIRECT EXAMINATION
 19 BY MS. JONES:
 20 Q Ms. Motley, were you aware at any time of any
 21 special privileges given to Officer Collins by
 22 anyone, be it Chief Godbee, Chief Evans-- I'm sorry,
 23 not Evans-- Chief Ella Bully-Cummings, anyone in a
 24 higher-ranking capacity?
 25 A No.

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- 1 Q Were you aware when these issues were raised that he
 2 was not generally around as much as the other
 3 Community Relations officers?
 4 MR. GOLDPAUGH: "When these
 5 issues were raised," I'm just wondering because--
 6 MS. JONES: I will rephrase.
 7 Q (By Ms. Jones) When the issue that counsel brought
 8 up that Collins was not around, and he asked you did
 9 you remember conversations involving you've got this
 10 or you'll handle this or what have you, do you know
 11 if that was ever brought up to you--
 12 MR. GOLDPAUGH: I'm going to
 13 object to this line at this point in time because
 14 she indicated she did not recall any of those
 15 things. Then when I asked the specific question,
 16 well, if you said this, what did you mean by that,
 17 the prosecution objected, and it was upheld.
 18 MS. JONES: That was because he
 19 was asking for speculation. I'm just asking her
 20 does she recall these issues being raised at all?
 21 MR. GOLDPAUGH: She has already
 22 indicated she did not do that.
 23 MS. JONES: She indicated she
 24 did not have that conversation, but she has not
 25 answered the question if she remembers this being

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- 1 brought up.
 2 MR. GOLDPAUGH: My objection is
 3 on the record.
 4 COMMANDER ENNIS: I will
 5 sustain the objection.
 6 Q (By Ms. Jones) The community meetings that counsel
 7 asked you about, are they weekly, daily, once a
 8 month, once very quarter?
 9 A It varies. It depends on what group it is. Most of
 10 them are monthly.
 11 MS. JONES: Pass to the Panel.
 12 COMMANDER ENNIS: Inspector
 13 Sroka?
 14 INSPECTOR SROKA: Nothing, sir.
 15 COMMANDER ENNIS: Inspector
 16 INSPECTOR BLACKMON: Nothing.
 17 COMMANDER ENNIS: Thank you,
 18 Chief, you're excused.
 19 MS. JONES: I appreciate you
 20 coming in. Thank you.
 21 (At 9:48 a.m., witness excused)
 22 MS. JONES: Pastella Williams
 23 is my next witness.
 24 UNIDENTIFIED: Raise your right
 25 hand. Do you swear or affirm that the testimony you

7 (Pages 51 to 54)

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1 are about to give to the Board is the truth?

2 LIEUTENANT WILLIAMS: I do.

3 PASTELLA WILLIAMS

4 (At 9:49 a.m., sworn as a witness, testified
5 as follows)

6 DIRECT EXAMINATION

7 BY MS. JONES:

8 Q Please make sure that your responses are verbal, no
9 um-ums or uh-uhs, no nods or shakes of the head
10 because you are being recorded, and the recorder
11 can't pick that up.

12 A Okay.

13 Q Thank you. Speak a little loud. I know you have a
14 tendency to speak soft, so I need you to speak in
15 your street voice if possible.

16 Please state your name for the
17 record?

18 A Pastella Williams.

19 Q Where are you employed?

20 A Detroit Police Department, Eastern District.

21 Q What is your rank?

22 A Lieutenant.

23 Q Badge?

24 A L-111.

25 Q At the Eastern District, what are your duties?

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1 A I'm acting inspector of the Ninth Precinct.

2 Q What are your duties as acting inspector, please?

3 A I oversee the day-to-day duties of patrol.

4 Q Do you have any responsibilities over the Community
5 Relations Unit?

6 A No.

7 Q At some point in time, were you over the Eastern
8 District Community Relations Unit?

9 A No.

10 Q Was a Sergeant Mattie Lewis working under you?

11 A She was under admin.

12 Q When you say under admin, what are you referring to?

13 A The administrative offices of Eastern at that time.

14 Q That would be the inspector-- give me the time
15 period that you were there when Collins was there?

16 A What is the question?

17 Q What is the time frame that you were there?

18 A Oh, I was there from-- I can only give you the year,
19 I can't give you the months-- 2006 to 2010, about
20 January of 2010.

21 Q Then you came to the Discipline Unit?

22 A No. I left Eastern District and went to the Office
23 of the Assistant Chief.

24 Q That Assistant Chief would have been?

25 A Meyers.

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1 Q When you say working under admin, would that be the
2 commander and inspector?

3 A Yes.

4 Q So Community Relations didn't fall under your
5 purview?

6 A No. I don't recall that they really-- I only saw
7 them when Mattie may have been on furlough, and I
8 had them come and report directly to me.

9 Q When you say you had them come directly to you, was
10 there a roll call?

11 A No, there wasn't a formal roll call. I had them
12 come in and let me know that they were on duty, and
13 I instructed them to turn in their activity logs to
14 me at the end of the day.

15 Q At the end of the day, could that mean 8:00 or 9:00
16 in the evening?

17 A Well, if they were past the time I got off, they
18 knew that they were to put it under the door or give
19 it to me first thing the next day.

20 Q Do you know Jerome Collins?

21 A Yes.

22 Q How do you know him?

23 A He is an officer that was assigned to Community
24 Policing at the Eastern District.

25 Q Do you know how the Community Relations Unit or

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1 Community Policing Unit was run as it relates to
2 when they would report, what shift they were to
3 report to?

4 A As far as I know, they worked days, but I do know
5 they had the occasion to change their hours because
6 they had meetings in the evening. They had to go to
7 all the community relations meetings and so forth.
8 So they did have a tendency to change their hours.

9 Q So because of some evening activities, they may have
10 changed their hours. Would that have been reflected
11 on their activity log?

12 A It should have been, yes.

13 Q What is the purpose of an activity log?

14 A To keep an accurate record of what you did
15 throughout your tour of duty.

16 Q So if you changed your hours, your activity log
17 should have reflected that. Correct?

18 A Correct.

19 Q Do you know of any situation where Officer Collins
20 was given special permission or privileges that he
21 could work outside of the City of Detroit Police
22 Department?

23 A No.

24 Q Do you know if he applied to work outside of the--
25 MR. GOLDPAUGH: I'm sorry, the

8 (Pages 55 to 58)

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1 question, the way it was phrased, you said could he
2 work outside the City of Detroit.

3 MS. JONES: Police Department.

4 MR. GOLDPAUGH: Police
5 Department, yes, but are you saying did he get
6 permission for outside employment?

7 MS. JONES: That was my second
8 question.

9 MR. GOLDPAUGH: The question
10 just left something-- as to what she was asking for.
11 Was he able to physically work outside the City of
12 Detroit, that's what I'm saying.

13 MS. JONES: You will get your
14 turn.

15 MR. GOLDPAUGH: I'm just
16 wondering, the way the question was posed.

17 Q (By Ms. Jones) Were you aware, did he apply for
18 outside employment?

19 A Not that I'm aware of. I don't know.

20 Q As far as you know, did he have permission to work
21 outside employment?

22 A I don't know. I have no idea.

23 Q At some point in 2009, it was brought to the
24 attention of the Department that he, Officer
25 Collins, was working for another company while he

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1 should have been working at the police department.
2 Are you aware of this?

3 A I became aware of it.

4 Q How did you become aware of it?

5 A People talking about it.

6 Q Did you take any action as it relates to that?

7 A No, I did not.

8 MS. JONES: Nothing further of
9 this witness at this time.

10 CROSS-EXAMINATION

11 BY MR. GOLDPAUGH:

12 Q Good morning, Lieutenant.

13 A Good morning.

14 Q Lieutenant, according to your testimony, you arrived
15 at the Ninth Precinct, Eastern District, some time
16 in 2006. Is that correct?

17 A I think so.

18 Q Who was the head of the district or the precinct at
19 that point in time?

20 A I think it was Commander Godbee, and Moreland (sic)
21 was still there.

22 Q When you arrived there, were you always the-- once
23 you got there, were you the admin lieutenant?

24 A No.

25 Q What were you first?

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1 A Platoon one lieutenant.

2 Q Then you became the admin lieutenant?

3 A Yes.

4 Q When did that occur?

5 A I think about a year after I got there.

6 Q So for that first year when Commander Godbee was
7 there, you didn't have any dealings with Sergeant
8 Mattie Moore (sic) or Community Relations in
9 general. Would that be a fair statement?

10 A Mattie Lewis?

11 Q Mattie Lewis, I'm sorry.

12 A Other than them coming and going, no, not directly.

13 Q That's what I mean, not directly. Once you became
14 the administrative lieutenant, that fell under your
15 purview more than as the shift lieutenant. Would
16 that be a fair statement?

17 A Yes.

18 Q So when you became the administrative lieutenant,
19 was that still under Commander Godbee, or was that
20 now under his successor, which would have been Joyce
21 Motley?

22 A I can't answer that question. I don't know.

23 Q But suffice to say there came a point in time when
24 you then became over a number of different staff
25 things, one of which was the Community Relations.

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1 Correct?

2 A Only when Sergeant Lewis was not there.

3 Q That is my question. So Sergeant Lewis was in
4 charge of the Community Relations, and she ran it
5 under the direction of whom? Who did she report to?

6 A Whoever the commander was at that time.

7 Q So she reported directly to the commander, and you,
8 as administrative lieutenant, reported directly to
9 the commander, but if Sergeant Lewis wasn't there,
10 then you would fulfill her duties as well. Would
11 that be a fair statement?

12 A That is fair.

13 Q Okay, good. Did there come a point in time after
14 Commander Dolunt took over that the Community
15 Relations individuals were directed to report to you
16 specifically?

17 A I don't recall that.

18 Q Did there come a point in time when there was a
19 discussion that you might have been present for
20 regarding the unavailability or the fact that a lot
21 of times people didn't know what was going on with
22 Community Relations and where the officers were at
23 specific times?

24 MS. JONES: Objection. I would
25 ask him to rephrase that question. It is compound,

9 (Pages 59 to 62)

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1 convoluted.

2 MR. GOLDPAUGH: I will agree
3 with convoluted. I don't know about compound. But
4 okay, I will rephrase it.

5 COMMANDER ENNIS: Thank you.

6 Q (By Mr. Goldpaugh) Were there ongoing discussions
7 regarding the Community Relations Unit once
8 Commander Dolunt arrived there?

9 A I can't recall that. I don't know at what point.

10 There was always conversation about their
11 whereabouts and what they were doing. I can't say
12 what commander was in place at that time.

13 Q You got there basically as an admin lieutenant, and
14 so when you left, those conversations were ongoing?

15 A I won't say ongoing, but they came up from time to
16 time.

17 Q Do you recall specifically what might trigger any of
18 these conversations, what incident and so forth?

19 A No.

20 Q Now, I'm showing you an activity log that is part of
21 a stack of exhibits, but it is Exhibit No. 3, and it
22 is dated March 2, 2009. I know you probably haven't
23 seen that, but do you recognize that as a Department
24 document?

25 A Yes.

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1 COMMANDER ENNIS: Counsel, for
2 the sake of clarity, can you tell us whose activity
3 log that is?

4 MR. GOLDPAUGH: Oh, I'm sorry.
5 This is part of the exhibit, it's Jerome Collins.

6 COMMANDER ENNIS: Part of
7 Exhibit No. 3?

8 MR. GOLDPAUGH: Exhibit No. 3.
9 I apologize.

10 COMMANDER ENNIS: Just for the
11 sake of clarity, is that just Officer Collins'
12 activity log?

13 MR. GOLDPAUGH: That's correct.
14 There is only Officer Collins' name on this activity
15 log.

16 Q (By Mr. Goldpaugh) I also want to show you one that
17 is dated-- again, I'm showing you another document
18 that has Jerome Collins' name on it. Is that
19 correct?

20 A Yes.

21 Q There is no signature next to that one, is there?

22 A No.

23 Q That one has been signed in or reviewed by Sergeant
24 Lewis. Is that correct?

25 A Yes.

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1 Q Does that indicate a specific date?

2 A Yes.

3 Q The date is March 2, as I have indicated?

4 A Yes.

5 Q There is the name of Jerome Collins there. Is that
6 correct?

7 A Correct.

8 Q There is a signature next to that. Is that correct?

9 A Yes.

10 Q Where that was signed in, is there somebody who
11 accepted that document?

12 A There is no indication of such.

13 Q In other words, it appears that there is no
14 supervisor checking that particular log. Is that
15 correct?

16 A Right.

17 Q I'm showing you also one for March 3, the same
18 questions.

19 MS. JONES: Is that March 3,
20 2009, 2008 or 2007?

21 Q (By Mr. Goldpaugh) I'm sorry, 2009. The only ones
22 I will be dealing with deal with the allegations
23 with respect to Charge IV. Is that correct, it's
24 not signed in?

25 A Yes.

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1 MR. GOLDPAUGH: May I have one
2 second?

3 COMMANDER ENNIS: Certainly.

4 Q (By Mr. Goldpaugh) Lieutenant, I know it was a long
5 time ago, and I'm sure I know the answer, but I'm
6 going to ask you anyway. Can you specifically
7 recall Officer Collins reporting to you?

8 A Yes. There were times, yes.

9 Q Can you tell me the time frame of when that may have
10 occurred?

11 A No, I cannot.

12 Q You are just saying that when Mattie Lewis wasn't
13 there, you took over control. Correct?

14 A I had them report to me for on duty.

15 Q Would it be a fair statement then that, on those
16 particular days when they reported on duty to you,
17 you would have been the one who would have signed
18 off on the log as well?

19 A Not necessarily.

20 Q Did you, while you were the admin, hear any rumors
21 about Officer Collins working a second job?

22 A I became aware of it once the complaint was made.

23 Q Prior to the complaint being made, did you hear
24 anything about that?

25 A I think once I did.

10 (Pages 63 to 66)

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1 Q I know it was a while ago, but can you recall
2 approximately when that might have occurred?
3 A No.
4 Q Did you follow up on that in any way, shape or form?
5 A No, I did not.
6 Q Do you recall approximately-- you said once these
7 allegations came out, that is when you became more
8 aware of it. Do you recall approximately how much--
9 let me rephrase this.
10 When you heard these rumors, do
11 you recall approximately when that was in relation
12 to when this letter was received and the
13 investigation started?
14 A No, I don't.
15 Q So it came to your attention that there was a point
16 in time where Mattie Lewis was being, I guess, for
17 lack of a better term, investigated with respect to
18 this ongoing situation with the log sheets and
19 Community Relations at the Eastern District. Is
20 that correct?
21 A What is the question?
22 Q There came a point in time when these allegations
23 came forth against Officer Collins, there were
24 allegations made against other people with respect
25 to improprieties in the activity logs, is that

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1 correct, at Community Relations?
2 A Yes.
3 Q One of the subjects of that investigation was Mattie
4 Lewis. Is that correct?
5 A I do believe, yes.
6 Q Had you addressed with her that situation and what
7 was going on with her subordinates, for lack of a
8 better term?
9 MS. JONES: Objection,
10 foundation. We don't know if she was there at the
11 time. If you recall, John, Pastella was in DAU.
12 She wasn't assigned there originally.
13 MR. GOLDPAUGH: I was just
14 asking if she-- I will ask the question.
15 Q (By Mr. Goldpaugh) When you became aware of the
16 investigation, were you still at the Eastern
17 District?
18 A I don't know when the investigation began, so I
19 can't answer that question. I don't know.
20 Q Well, when did you come to DAU?
21 A I didn't come to DAU from Eastern. I went to the
22 Assistant Chief's Office.
23 Q When did you go to the Assistant Chief's Office?
24 A 2010.
25 Q These allegations came out in 2009. Is that

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1 correct?
2 A I don't know.
3 MR. GOLDPAUGH: All right. May
4 I approach?
5 COMMANDER ENNIS: Yes.
6 Q (By Mr. Goldpaugh) I am showing you what purports
7 to be a transcript of your Garrity interview. Can
8 you look at the date on that?
9 A January 25, 2010.
10 Q Thank you. Would it be a fair statement that you
11 were aware of the investigation on January 10--
12 A Yes.
13 Q You were still at Eastern District at that point in
14 time?
15 A I don't think so.
16 Q You said you went to the Chief's--
17 A I would have to see my records to know exactly what
18 date I left. I don't know.
19 Q I understand. Well, I guess my question then is,
20 from the point in time that you learned of this, did
21 you ever have a discussion with Sergeant Lewis
22 regarding it?
23 A No.
24 Q There was a newspaper article which has been
25 admitted as exhibit number, I think it's 11--

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1 COMMANDER ENNIS: Yes, that's
2 correct.
3 Q (By Mr. Goldpaugh) This was dated January 15 of
4 2010. Did you see this newspaper article?
5 A I have no idea if I did or not.
6 Q When you left, Commander Dolunt and Commander Moore
7 were still at the Eastern District. Is that
8 correct?
9 A I can't speak on Moreland.
10 Q Not Moreland, Moore.
11 A Oh, I'm sorry, right, yes.
12 MR. GOLDPAUGH: No other
13 questions of this witness.
14 MS. JONES: Just briefly, one
15 question, I believe, maybe two.
16 REDIRECT EXAMINATION
17 BY MS. JONES:
18 Q When the investigation started in December of 2009,
19 were you ever under investigation in relation to the
20 accusations of time fraud?
21 A No.
22 MS. JONES: Pass to the Panel.
23 COMMANDER ENNIS: Inspector
24 Sroka?
25 INSPECTOR SROKA: Nothing.

11 (Pages 67 to 70)

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1 COMMANDER ENNIS: Inspector
2 Blackmon?
3 INSPECTOR BLACKMON: Nothing.
4 COMMANDER ENNIS: Thank you.
5 You are excused.
6 (At 10:16 a.m., witness
7 excused)
8 MS. JONES: We will call
9 Commander Dolunt.
10 UNIDENTIFIED: Raise your right
11 hand. Do you swear or affirm that the testimony you
12 are about to give the Board is the truth?
13 COMMANDER DOLUNT: Yes.
14 STEVEN DOLUNT
15 (At 10:18 a.m., sworn as a witness, testified
16 as follows)
17 DIRECT EXAMINATION
18 BY MS. JONES:
19 Q Please make sure that your responses are verbal, no
20 nods of the head or shakes of the head. You are
21 being recorded. It does not record um-hums or
22 uh-huhs. Understood?
23 A Yes.
24 Q Please state your name for the record?
25 A Steven Dolunt.

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1 Q Where are you employed?
2 A Detroit Police Department.
3 Q What is your rank?
4 A Commander.
5 Q Where are you located?
6 A Northwest District.
7 Q At some point in time, were you assigned to the
8 Eastern District of the police department?
9 A Yes.
10 Q Do you recall what that time frame was?
11 A I'm going to say 2007 till 2012. I'm not totally
12 sure on those dates, the beginning date.
13 Q Do you know a police officer by the name of Jerome
14 Collins?
15 A Yes.
16 Q How do you know him?
17 A He was assigned to the Eastern District.
18 Q In what department? Was it patrol, Community
19 Relations?
20 A Community Relations.
21 Q When you were present at the Eastern District, do
22 you recall if the officers in Community Relations
23 were to fill out activity logs?
24 A Yes.
25 Q What is the purpose of the activity log, sir?

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1 A To give a summary of their activities for the day.
2 Q If they were to-- strike that. Generally, what
3 shift did they work?
4 A I want to say either 10:00 to 6:00 or 11:00 to 7:00.
5 Q If they were to stay late or have to come in early,
6 would they reflect that on their activity log?
7 A They should document it, yes.
8 Q Did there come a time when you became aware that
9 there were some time fraud issues going on in the
10 Community Relations office?
11 A Yes.
12 Q What brought that to your attention?
13 A In this particular case, I wasn't seeing Officer
14 Collins.
15 Q I'm sorry?
16 A In this particular case, I wasn't seeing Officer
17 Collins.
18 Q Okay. Did you come to find out where he was going
19 or where he had been?
20 A Yes. There were allegations.
21 Q What were those allegations, sir?
22 A That he was working other jobs while he was on the
23 clock with the Detroit Police Department.
24 Q Did you verify those allegations?
25 A I didn't. Internal Affairs did.

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1 Q Did Collins himself have permission to work outside
2 employment?
3 A Not as far as I know.
4 Q Did he come to you and apply?
5 A No.
6 Q Aren't the officers supposed to apply every year?
7 A Yes, through the Chief's office.
8 Q Was there ever a time that you told-- strike that.
9 Was there ever a time you were told by anyone in the
10 Chief's office or in a higher rank than you that
11 Collins was to report directly to them?
12 A I can't remember the exact wording. Myself and
13 Commander Moore brought our concerns to then Deputy
14 Chief Joyce Motley, and she told us to let it go.
15 Q She told you, let it go?
16 A Let it go.
17 Q Did she say why?
18 A No, just let it go.
19 Q At some point in time, did you allow him any special
20 privileges?
21 A Did I allow him? No.
22 Q You did not allow him. Do you know of anyone else
23 who allowed him special privileges?
24 A I guess Deputy Chief Motley.
25 Q When I say special privileges, what are you

12 (Pages 71 to 74)

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1 interpreting that to mean?

2 A Probably that he had a flexible work schedule and
3 that he could do his outside employment.

4 Q But you don't know for a fact. You said probably.
5 Correct?

6 A I have never seen anything in writing that said,
7 yes, he could do this. So I'm assuming.

8 Q We don't want you to assume. We want you to speak
9 on personal knowledge. So do you have personal
10 knowledge that he was given flex hours?

11 A No.

12 Q As it relates to Community Relations officers or
13 Community Policing officers, did they have flex
14 hours?

15 A They could, but it would go through our office
16 first. If there is a community meeting or something
17 special like on a Saturday, which is a leave day for
18 them, we adjust their hours accordingly.

19 Q So they would have to come through the
20 administrative offices to do that or through the
21 desk sergeant?

22 A No, their sergeant. Their sergeant would come to us
23 and say, listen, on such and such a day, this is
24 going on, we need to change their hours, or can we
25 switch a day, this is going on. Because they did a

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1 good job.

2 Q You had no complaints about-- what events he was
3 supposed to be covering, he covered?

4 A Whenever there was a run to the school he was in
5 charge of, he was there.

6 Q As it relates to the allegations that he was working
7 outside employment when he should have been working
8 at the City of Detroit, you indicated that you did
9 not take any action, and Internal Affairs did the
10 investigation?

11 A No. Actually, myself and Commander Moore, after
12 Deputy Chief Motley left the Department, that was
13 one of the first things we did, we contacted
14 Internal Affairs about our concerns.

15 We had received a letter, I
16 believe it was from his wife or ex-wife or
17 something, and so we were concerned about it. We
18 called Internal Affairs and asked them to
19 investigate.

20 A short time later, they said
21 we've got nothing. We can't find anything. That
22 was fine. I think it was a year later when Chief
23 Evans got the same letter, he went to Internal
24 Affairs and, within a day or two, they found out
25 there were irregularities.

1 MS. JONES: I am approaching
2 with Exhibit No. 10, counsel, and I also have the
3 letter.

4 Q (By Ms. Jones) Is that the letter you are referring
5 to?

6 A I don't think this is the particular letter, because
7 it was more in-depth that I recall.

8 Q So the letter you received was more in-depth. This
9 is a letter to the Chief.

10 A Yes.

11 Q Referring to Exhibit No. 11, do you recall that news
12 article in the paper?

13 A Not offhand. What is this, the Free Press?

14 Q Yes.

15 A Not offhand.

16 Q Thank you. Did you turn that letter in that you
17 referenced, did you turn it in to Internal Affairs?

18 A I believe so.

19 Q Do you know who, if anyone, was assigned to look
20 into it?

21 A The first time, no. The person I contacted the
22 first time was Commander Stair. I don't know who he
23 assigned it to.

24 Q Do you know when that took place?

25 A A little bit before Warren Evans became Chief,

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1 probably the year prior. I'm not sure when Warren
2 Evans became Chief, what year.

3 MS. JONES: Nothing further of
4 this witness.

5 CROSS-EXAMINATION

6 BY MR. GOLDPAUGH:

7 Q Good morning.

8 A Good morning.

9 Q Commander, my understanding is that some time before
10 the allegations we are now addressing, you received
11 an anonymous letter. Is that correct?

12 A Yes.

13 Q Based on that, you did some investigating yourself.
14 Would that be a fair statement?

15 A I contacted Internal Affairs.

16 Q You contacted Internal Affairs. Did you at that
17 time, as part of that situation, realize that there
18 were no activity logs from Officer Collins for 2007
19 and 2008, or 2007 at least?

20 A Probably.

21 Q Is that when you went along with Commander Moore and
22 checked out and made some demands, rightfully so, on
23 Sergeant Lewis to make sure that Jerome Collins was
24 doing activity logs?

25 A Yes.

13 (Pages 75 to 78)

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- 1 Q You also, at that point in time, directed Commander
2 Moore or had Commander Moore also making sure that
3 the assignments were being given out. Would that be
4 a fair statement?
5 A We worked together. I didn't really tell him. I
6 wouldn't give Commander Moore an order.
7 Q And I didn't mean it that way. It came to your
8 attention that there were some irregularities with
9 respect to the Community Relations. Would that be a
10 fair statement?
11 A Yes.
12 Q It wasn't just Jerome Collins, was it?
13 A No.
14 Q In fact, based on certain statements-- did you talk
15 to Sergeant Lewis regarding this?
16 A Yes.
17 Q Did she tell you that she had been informed by both
18 Commander Godbee and Inspector Motley that they were
19 to report directly to those individuals?
20 A I don't remember specifically what she said. I
21 think it-- Motley was a Deputy Chief--
22 Q Correct.
23 A And Godbee was the commander before. I think she
24 may have alluded to the fact that he reported to
25 them.

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- 1 Q Right, and you then tried to clean that up. Would
2 that be a fair statement? By that, I mean they were
3 supposed to be reporting to you?
4 A Oh, absolutely.
5 Q In fact, as part of this, did you actually go out to
6 Canton to see what he was doing about running sports
7 camps and athletics and things like that?
8 A No.
9 Q You indicated that you turned over this information
10 to Internal Affairs?
11 A Yes.
12 Q They basically said we don't have anything. Would
13 that be a fair statement?
14 A They said, we couldn't find anything. We don't have
15 enough time to investigate this right now if I
16 recall at the time.
17 Q Then a year later, the same thing surfaces. Would
18 that be a fair statement?
19 A Whenever Evans became Chief, yes.
20 Q And this letter, the exhibit that was shown to you?
21 A Correct.
22 Q Did you specifically talk to Officer Collins
23 regarding the allegations that came down the first
24 time?
25 A Probably.

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- 1 Q After you notified Internal Affairs the first time,
2 did you start to see Collins more often?
3 A Yes. He made a point to see me.
4 Q He made a point to see you to say I'm here, and I'm
5 taking care of business basically?
6 A I'm here, yes.
7 Q Did there also come a point in time when you had
8 Officer Collins directly report to Lieutenant
9 Williams in this matter?
10 A I think that's possible. I'm not sure offhand, but
11 it sounds like something I would do.
12 MR. GOLDPAUGH: May I approach?
13 COMMANDER ENNIS: Yes.
14 MR. GOLDPAUGH: I'm just
15 showing him something to refresh his memory.
16 MS. JONES: What are you
17 showing him?
18 MR. GOLDPAUGH: His Garrity
19 interview.
20 Q (By Mr. Goldpaugh) The bottom of the page may
21 refresh your memory.
22 A Okay.
23 Q Does that refresh your memory?
24 A A little bit, yes.
25 Q Thank you. The Community Relations Unit, for the

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- 1 most part, some of them were alone and some were
2 with partners. Would that be a fair statement?
3 A Yes.
4 Q Officer Collins worked alone. Is that correct?
5 A Yes.
6 Q There would be times, of course, when there may be a
7 group activity, and they would all go and work
8 together, but normally they would be either
9 partnered up or working alone. Would that be a fair
10 statement?
11 A Yes.
12 Q Was Kenya Borden part of that, Community
13 Relations?
14 A Yes.
15 Q So was Tobias Rios. Is that correct?
16 A Yes.
17 Q When the investigation that we are here for today
18 came forth, this investigation was not only about
19 Officer Collins but also about other officers, is
20 that correct, initially?
21 A Initially, I had information on just Officer
22 Collins. Eventually, it went to the way Community
23 Relations was being managed.
24 Q That was including the investigation into Kenya
25 Borden who--

14 (Pages 79 to 82)

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1 MS. JONES: I'm going to object
2 because this Internal Affairs investigation is just
3 to Collins.

4 MR. GOLDPAUGH: Part of the
5 exhibits and part of the testimony that has been
6 admitted referred to this entire investigation, and
7 that is why in my opening statement, I brought forth
8 this information.

9 This was all raised in the
10 opening statement by Ms. Jones.

11 COMMANDER ENNIS: Overruled.

12 MR. GOLDPAUGH: Thank you.

13 Q (By Mr. Goldpaugh) Commander, is that correct?

14 A What was the question?

15 Q My question, which was objected to, it may have
16 started out with Officer Collins, but it eventually
17 came into, as you testified, the way it was being
18 run and the alleged criminal activity of other
19 individuals. Would that be a fair statement?

20 A Yes.

21 Q One of those was Kenyata Borden. Is that correct?

22 A Yes.

23 Q One was Sergeant Lewis. Is that correct?

24 A Yes.

25 MS. JONES: Objection to both

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1 of these questions, continued objection. This has
2 nothing to do with Collins. We are here for
3 Collins.

4 MR. GOLDPAUGH: It goes to
5 disparate treatment, and it goes to the very subject
6 that she made in her opening statement, what the
7 liabilities should be and the penalty should be for
8 this particular officer. That's all.

9 MS. JONES: I did not bring up
10 anything in my opening statement about other
11 officers. I don't recall that.

12 Secondly, this is about
13 Collins. It is about whether he violated a
14 Department rule and, if so, what his penalty should
15 be based on other factors.

16 But an opening statement is not
17 evidence. Therefore, I don't know what counsel is
18 saying.

19 MR. GOLDPAUGH: No, but an
20 opening statement also is a road map as to what they
21 expect to prove to support not only the finding of
22 guilt but also the penalty that is meted out.
23 Therefore, the entire investigation comes to this
24 point.

25 That's all I'm asking. I have

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1 only asked a question. I haven't asked for the
2 outcome of those. I just want to know if he knew
3 about this, that's all. If he doesn't know about
4 it, he doesn't know about it.

5 MS. JONES: If counsel is
6 speaking to the entire investigation, I'm looking at
7 the investigation, and we didn't mark it in as an
8 exhibit. This is about Jerome Collins.

9 MR. GOLDPAUGH: Also, as part
10 of that investigation, Sergeant Mattie Lewis was
11 questioned under an investigative subpoena which was
12 a part of our discovery materials. In that
13 investigative subpoena, it also has the name of
14 Kenyata Borden on it and time fraud.

15 In my experience as a criminal
16 defense attorney, when an individual gets an
17 investigative subpoena, that does not mean that he
18 or she is not subject to criminal charges. It can
19 be used against that person if in fact it is going
20 to be used.

21 MS. JONES: Once again, I'm
22 going to object to this line of questioning because
23 the misconduct report-- whether this investigation
24 led into other investigations, that is not what we
25 are here for.

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1 We are here because of Jerome
2 Collins, and Jerome Collins' case does not say
3 Jerome Collins, Mattie Lewis and what's the other
4 chick's name you said?

5 MR. GOLDPAUGH: The other
6 chick, as you put it, was Kenyata Borden, and there
7 were charges--

8 MS. JONES: And--

9 MR. GOLDPAUGH: Hold it. Look,
10 she brought it up.

11 MS. JONES: It doesn't state
12 that on here.

13 MR. GOLDPAUGH: No, but it
14 probably should have.

15 MS. JONES: But it doesn't.

16 MR. GOLDPAUGH: I know that.

17 COMMANDER ENNIS: All right--

18 MR. GOLDPAUGH: But if I may
19 respond since this was brought up here, the charges
20 against Mattie Lewis and Kenyata Borden
21 departmentally were brought but under different file
22 numbers. She brought that up.

23 MS. JONES: That has nothing to
24 do with this case.

25 MR. GOLDPAUGH: You are the one

15 (Pages 83 to 86)

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1 who just said it didn't say it on there. I know it
2 doesn't.

3 **COMMANDER ENNIS:** Extremely
4 limited, extremely little leeway. The case before
5 this Trial Board is focusing on the activities of
6 Officer Collins.

7 We have already made note of
8 the general overall complaint regarding the entire
9 Community Relations Unit, but this particular Trial
10 Board is related to the activities of Officer
11 Collins.

12 Anyone else, whether it is
13 Mattie Lewis or Officer Borden or Officer Tobias
14 Rios, are all severed investigations if they
15 happened, and I believe everybody has some
16 independent recollection of them being mentioned.

17 But I don't and the Board does
18 not want to go into a long discussion and review of
19 charges that were filed against other officers
20 because it is not germane to the activities of
21 Officer Collins. The general overall activities of
22 Community Relations is not what the Trial Board is
23 focusing on.

24 **MR. GOLDPAUGH:** I understand
25 that, and I wasn't going much further into that. I

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1 wrong. Borden was suspended for quite some time.

2 It is my understanding that
3 they owed her time, and they gave her slide time,
4 which is fine, but you can't leave the country for
5 slide time, it's cheaper than overtime, I'll take
6 care of that. I agree with that.

7 Neither of those two were
8 working another job at the same time that they were
9 supposed to be working for me. The management was
10 slipshod there, the sergeant was suspended.

11 But again, they were all
12 different circumstances and, under the broad
13 spectrum of time fraud, those officers and that
14 supervisor did not take it upon themselves to work
15 another job while they were being paid by the
16 Detroit Police Department to do that job and carry
17 on a charade that they were there all the time.

18 Like I have said many a time, I
19 don't get any help looking stupid, I got it down
20 pat, and Officer Collins, Officer Rios and Officer
21 Borden made me look stupid. Officer Collins made
22 the Department look inept and myself look inept.

23 I happen to like Officer
24 Collins. He just got too big for his britches.
25 Does that answer your question?

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1 was just asking him if he was aware of that. That's
2 all.

3 **COMMANDER ENNIS:** You may
4 repeat your question.

5 **Q (By Mr. Goldpaugh) Commander?**

6 **A Yes.**

7 **Q Once the second set of allegations, I'm not talking**
8 **about the first one, once the second set of**
9 **allegations came into being, they investigated more**
10 **than just Jerome Collins. Would that be a fair**
11 **statement? You became aware of that?**

12 **MS. JONES:** Continuing
13 objection.

14 **COMMANDER ENNIS:** Overruled.
15 Go ahead.

16 **THE WITNESS:** No. What
17 happened was the letter came, the second letter on
18 Collins. I sent that to Internal Affairs. This is
19 like the perfect storm, because right around the
20 same time, an officer came to me and said, how come
21 I can go on a cruise and Borden goes on a cruise,
22 and Borden gets paid and I don't?

23 I didn't know about that. At
24 the same time, Rios did his thing. It was poor
25 management, Rios get fired for what he did. It was

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1 **Q (By Mr. Goldpaugh) No, because it went well beyond.**
2 **All I asked was were you aware of the investigation?**

3 **A No.** What you asked me was-- now, what did you ask
4 me, John? What was the question?

5 **Q You have answered my question. You answered well**
6 **beyond what I asked.**

7 **A You asked me did the Collins investigation lead to**
8 **the other ones? No. It was the perfect storm.**

9 The other things came forth
10 when people seen that I was actually doing something
11 about Collins. They were like, oh, wait a minute,
12 how about this, this and this? That's the answer.

13 **Q I understand that. That wasn't my question. My**
14 **question was, because of Collins, did it lead to**
15 **other criminal investigations? That was my only**
16 **question.**

17 **A His did not lead to others, but people brought**
18 **things to my attention.**

19 **Q Then they combined it with Mattie Lewis, correct,**
20 **and her running of the-- correct?**

21 **A Yes.**

22 **Q Thank you. You had from Mattie Lewis' statements**
23 **that she had taken the actions of Jerome Collins to**
24 **her previous commanders, meaning D.C. Motley and**
25 **previously to Godbee, and they had said, we'll take**

16 (Pages 87 to 90)

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1 care of it. Would that be a fair statement?
 2 A Yes.
 3 Q You took this to D.C. Motley and raised concerns.
 4 She said, I've got it covered or something to that
 5 effect. Is that correct?
 6 A The first time.
 7 Q The first time dealing specifically with Jerome
 8 Collins?
 9 A Yes.
 10 Q She left. Mattie Lewis and Jerome Collins are still
 11 acting in the same-- following the same procedures
 12 as beforehand, and then a second letter arrives.
 13 Correct?
 14 A The second letter arrived--
 15 Q With respect to Jerome Collins.
 16 A Yes.
 17 Q That is sent down to Internal Affairs and triggers
 18 the investigation against Officer Collins and his
 19 relationship with Sergeant Lewis in respect to the
 20 criminal investigation. Would that be a fair
 21 synopsis?
 22 MS. JONES: I'm sorry, I'm even
 23 confused by that.
 24 THE WITNESS: You've got me
 25 totally confused, John. Let me--

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1 Q (By Mr. Goldpugh) Let me just ask the question,
 2 please.
 3 A Okay.
 4 Q The letter triggers-- goes back to Internal Affairs.
 5 A Which letter?
 6 Q The second letter.
 7 A Okay.
 8 Q You have already brought to the attention of
 9 everybody in the Department regarding the anonymous
 10 letter.
 11 A Correct.
 12 Q And it fell on deaf ears basically.
 13 A Correct.
 14 Q You took steps to confirm that things were being
 15 taken care of. Is that correct?
 16 A Correct.
 17 Q Then a second letter comes, and now Chief Evans
 18 decides to get Internal Affairs more involved.
 19 Correct?
 20 A Correct.
 21 Q It is at this point in time that, for lack of a
 22 better term, Sergeant Lewis' running of Community
 23 Relations and the improper activity logs comes to
 24 light. Would that be a fair statement?
 25 A Yes.

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1 MS. JONES: Continued
 2 objection.
 3 COMMANDER ENNIS: I'm just
 4 waiting for a question.
 5 MR. GOLDPAUGH: I asked him a
 6 question, and then he went on with his--
 7 COMMANDER ENNIS: I understand,
 8 but let's--
 9 MR. GOLDPAUGH: I'm almost
 10 done. I will go off the subject.
 11 COMMANDER ENNIS: Let me say
 12 this: I simply want a question and a simple answer.
 13 THE WITNESS: I apologize.
 14 COMMANDER ENNIS: That's okay.
 15 MS. JONES: We know you are
 16 passionate.
 17 MR. GOLDPAUGH: And I am too.
 18 I understand that, and I understand what he said.
 19 Q (By Mr. Goldpugh) Would it be a fair statement in
 20 general that though you have hours that are
 21 specific, that is not always the way it works with
 22 respect to showing up at community efforts and
 23 things like that? Correct?
 24 A Yes.
 25 Q Would it be a fair statement that officers may be

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1 involved in certain activities on Saturdays or
 2 Sundays because of their relationship with the
 3 community?
 4 A Yes.
 5 Q But their assignment to Community Relations is
 6 basically five days during the work week. Would
 7 that be a fair statement?
 8 A Twenty-day cycle.
 9 Q Twenty-day cycle, okay. So normally, their leave
 10 days are weekends?
 11 A Normally.
 12 Q Did it come to your attention during this period of
 13 time that Officer Collins was using police
 14 equipment, the van and those types of things, during
 15 this period of time for his football programs and
 16 things like that on weekends?
 17 A I believe so.
 18 Q That wasn't documented on any type of activity logs,
 19 was it?
 20 A I don't believe so.
 21 Q In fact there were times when he was running these
 22 community programs dealing with the community that
 23 members of your command-- did it come to your
 24 attention that Chief Godbee or Commander Serda may
 25 have attended certain of his banquets and things

17 (Pages 91 to 94)

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1 like that?

2 A I don't know about that.

3 Q During that period of time when he was working for
4 the Department as a Community Relations officer,
5 none of that was documented on his activity logs,
6 was it?

7 MS. JONES: One second. During
8 what period of time?

9 Q (By Mr. Goldpaugh) The time when he ran his
10 football program that you are aware of.

11 A I don't know.

12 MR. GOLDPAUGH: Can we take a
13 short break just for a second?

14 COMMANDER ENNIS: Yes.

15 (At 10:51 a.m., recess taken)

16 (At 11:04 a.m., back on the
17 record)

18 COMMANDER ENNIS: Back on the
19 record. Counsel?

20 MR. GOLDPAUGH: Thank you.

21 Q (By Mr. Goldpaugh) Commander, when you discovered
22 after the first letter that there were no activity
23 logs prepared for Officer Collins or you couldn't
24 find anything for Officer Collins, was that true of
25 the remaining members of the Community Relations

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1 Section as well?

2 A I believe so.

3 Q So that was a point in time where there was no
4 accountability. Would that be a fair statement?

5 A Yes.

6 Q By way of activity logs. I mean the job was getting
7 done and things like that. Also, from the time when
8 you-- between the first and the second letter where
9 this accountability and the activity logs being
10 prepared and he was reporting to-- well, all of them
11 were reporting directly to either Sergeant Lewis or
12 to Lieutenant Williams, did you receive any
13 complaints about Officer Collins not doing his job
14 for Community Relations?

15 A Not that I recall.

16 MR. GOLDPAUGH: Nothing else.

17 MS. JONES: I have a few
18 questions based on a couple questions that counsel
19 asked you.

20 REDIRECT EXAMINATION

21 BY MS. JONES:

22 Q He asked you something about going to a sports arena
23 in Canton. Were you aware that Collins and his wife
24 owned a sports arena or something with batting cages
25 and basketball out in Canton?

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1 A That was in the first letter. That is when I first
2 found out. The first letter claimed that he ran a
3 basketball camp or some type of sports complex in
4 Canton.

5 Q Do you know if that was a volunteer type of thing,
6 or was it Department-sanctioned?

7 A It wasn't Department-sanctioned. It was out in
8 Canton, so it would have to be volunteer or an
9 outside employment.

10 Q As it relates to the activity logs, was it customary
11 for you to review activity logs on a regular basis?

12 A Myself, no, it's not part of my job.

13 Q But when you found out about the unavailability of
14 certain officers, is that when you went to look for
15 the activity logs?

16 A Yes.

17 Q The football program that counsel asked you about,
18 do you know if that was volunteer or Department-
19 sanctioned?

20 A As far as I know, it would be volunteer, because I
21 coach, and I don't get--

22 MR. GOLDPAUGH: I'm going to
23 object. She said do you know is it volunteer or was
24 it sanctioned. He can only testify as to what he
25 knows.

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1 THE WITNESS: Eastern District
2 did not sanction a football team or any of our
3 officers to coach a football team on Department
4 time.

5 Q (By Ms. Jones) If he were to coach a football team,
6 would it have been in the Detroit area? Would it
7 have been in Huntington Woods or would it have been
8 in Flint? Where would it generally have taken
9 place?

10 A The City of Detroit has a youth football program;
11 and at one time I believe the Police Athletic League
12 was involved, and at one time, to my understanding,
13 Officer Collins was assigned to the Police Athletic
14 League.

15 So maybe that is where it
16 started, but in the time frame we're talking about,
17 to the best of my knowledge, in fact I know Eastern
18 District didn't sponsor it. I'm not sure of the
19 inner workings of PAL. If PAL had that, then the
20 officers should have been assigned to PAL.

21 Q If it was determined or found that he was using the
22 Department van, is it possible he could have made
23 another key?

24 MR. GOLDPAUGH: I'm going to
25 object.

18 (Pages 95 to 98)

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1 Q (By Ms. Jones) If you know.

2 MR. GOLDPAUGH: Wait a minute.
3 This is well outside the scope of anything that was
4 on direct testimony.

5 COMMANDER ENNIS: Sustained.

6 Q (By Ms. Jones) Going back to the van, do you know
7 if he had permission to use the van to go to these
8 events?

9 A I personally would not object when an officer was
10 off duty coaching and said, I need a favor, I need
11 to borrow this amount of chairs. Can I use the van
12 to take these chairs to this function? Or I'm
13 taking so many kids to a function, I'm off duty.
14 I personally, and it's probably
15 against Department regulations, I would approve that
16 because you're doing it to help the youth. You are
17 not getting paid, you are doing it. So the
18 Department for years has always tried to help out
19 the community.

20 If an officer came to me and
21 said, can I use the van to do X, Y, Z, and I thought
22 it was a charitable thing, yes, you work with the
23 community, you're not getting paid for it, and you
24 can use the van. I'd even pay for the gas. But
25 you're not on duty doing it.

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1 Q Do you know if Officer Collins had permission to use
2 the van-- did you give him permission to use the
3 van?

4 A I don't recall. If he did that, he probably went
5 through Sergeant Lewis.

6 Q The first letter that you received, do you still
7 have a copy of it?

8 A I doubt it.

9 Q Do you recall what was in it?

10 A I think it was a complaint that Officer Collins was
11 working other jobs, specifically this sports
12 facility in Canton. I don't remember the name on
13 the letter. I recall his wife had sent the letter,
14 and there were a few things about various jobs he
15 was doing.

16 Again, the letter you showed me
17 was a brief paragraph. The letter I received the
18 first time was a page long and broke down a lot of
19 things.

20 Q As it relates to Officer Collins, were you aware
21 that he was also working St. John's Hospital and
22 Allen Academy?

23 A I found that out after.

24 Q At Allen Academy, were you aware that he worked not
25 only as a truant officer but also worked midnights

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1 in security?

2 A That was brought to my attention later as well.

3 Q Community Relations officers, generally they work
4 eight hours unless an event takes them over the
5 eight hours. Correct?

6 A That's correct.

7 Q Do you know what hours he worked at the other jobs?

8 A It is my understanding he worked days--

9 MR. GOLDPAUGH: I'm going to
10 object, this calls for hearsay.

11 COMMANDER ENNIS: Sustained.
12 Only if you have personal knowledge. Don't testify
13 to hearsay or what someone told you.

14 MS. JONES: Well, we are doing
15 an administrative hearing and, as counsel knows,
16 hearsay, as long as it is corroborated, it is
17 admissible, and we already have admitted the charts
18 and testimony.

19 MR. GOLDPAUGH: And it is
20 irrelevant and immaterial from this witness.

21 COMMANDER ENNIS: Why is that
22 irrelevant?

23 MR. GOLDPAUGH: Well, because
24 she is now asking him what does he think or what has
25 he heard. She has already admitted that we have

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1 already admitted the time charts for this Board. So
2 what he heard from somebody else may not even be
3 accurate as to what is in those charts.

4 But we do know those charts
5 allegedly are accurate because they are now in
6 evidence.

7 COMMANDER ENNIS: Did you have
8 a particular reason for--

9 MS. JONES: I will withdraw the
10 question.

11 COMMANDER ENNIS: It is
12 sustained.

13 MS. JONES: Nothing further of
14 this witness. Pass to the Panel.

15 MR. GOLDPAUGH: May I just on
16 something that she brought back up?

17 RE-CROSS-EXAMINATION

18 BY MR. GOLDPAUGH:

19 Q You indicated, I believe, with respect to the
20 football program that the Eastern District didn't
21 sponsor a team. Correct?

22 A Correct.

23 Q You also testified on direct testimony and also you
24 gave statements that Officer Collins, at least
25 according to the conversations that you had with

19 (Pages 99 to 102)

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1 both Mattie Lewis and with D.C. Motley, were don't
2 worry about Collins, I'll take care of this.

3 In other words, he was
4 reporting directly to those individuals, Godbee and
5 to Motley. Is that correct?

6 A Yes.

7 Q Were you aware that there were conversations with
8 respect to Godbee and the running of programs and a
9 football program so long as there were community
10 youths being involved?

11 MS. JONES: Excuse me,
12 objection. Outside the scope of my redirect.

13 MR. GOLDPAUGH: She brought out
14 the whole thing about football.

15 COMMANDER ENNIS: I'm sorry, I
16 was distracted. Could you repeat the question?

17 MR. GOLDPAUGH: The question
18 was, was he aware of any conversations where Deputy
19 Chief Godbee talked to Officer Collins regarding
20 community members being on football programs, and
21 I'm paraphrasing that.

22 She objected that it was
23 outside the scope. It clearly isn't because she is
24 the one who brought up the football programs and
25 whether it could be in this community or that

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1 community. I didn't do that.

2 COMMANDER ENNIS: I will
3 overrule it.

4 Q (By Mr. Goldpaugh) Were you aware of any of those
5 things?

6 A No.

7 MR. GOLDPAUGH: May I just have
8 one moment, please?

9 COMMANDER ENNIS: Yes.

10 Q (By Mr. Goldpaugh) You indicated on redirect that
11 you were aware that Officer Collins had been
12 involved with PAL. Correct?

13 A Yes.

14 Q And that had he been running programs of that
15 nature, then that is where he should have been
16 assigned out to or assigned to PAL as opposed to
17 Community Relations in the community. Is that
18 correct?

19 A If he is going to be doing it on Department time,
20 yes.

21 MR. GOLDPAUGH: Nothing else of
22 this witness.

23 MS. JONES: Just briefly.

24 REDIRECT EXAMINATION

25 BY MS. JONES:

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1 Q Counsel asked you a question as to Chief Godbee.
2 Godbee was not Chief at the time that this was
3 brought to your attention, was he?

4 A The first time?

5 Q Yes.

6 A Ella Bully-Cummings was Chief.

7 Q Godbee was not over the Eastern District when this
8 was brought to our attention, was he?

9 A No.

10 Q Therefore, if Godbee gave Collins permission back
11 when Godbee was at Eastern District, would that
12 permission still apply years later?

13 MR. GOLDPAUGH: That calls for
14 speculation. That calls for guesswork. Whether it
15 may technically not apply is one thing, but how it
16 is being treated by all that were involved is
17 another.

18 That is something for this
19 Board to determine. Because he didn't come
20 specifically and get that direction from this
21 commander, though it appears that the history has
22 been going on for quite a period of time, it is
23 totally inappropriate under the circumstances.

24 MS. JONES: There are two
25 different theories here. Their theory is he had

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1 permission. Our theory is he didn't, and we cannot
2 conclude one way or the other whether he did or
3 didn't. Therefore, this is a valid question.

4 COMMANDER ENNIS: Overruled.
5 Go ahead.

6 THE WITNESS: What was the
7 question?

8 Q (By Ms. Jones) Would the permission given by a
9 commander at one point in time-- it is similar to
10 when you are given an order, your first order, last
11 order.

12 Would permission given to
13 Collins back when Godbee was over Eastern District,
14 would that continue on throughout?

15 A Not necessarily. He would come to me and say,
16 listen, I have permission from Godbee to do this.
17 Can I still do this? That is how it would go. Then
18 I would make a determination.

19 Q Did he do that?

20 A No.

21 Q Do you know if he did have permission one way or the
22 other from either your predecessor Motley or your
23 predecessor Godbee?

24 A I don't know

25 MS. JONES: Thank you.

20 (Pages 103 to 106)

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RE CROSS-EXAMINATION

BY MR. GOLDPAUGH:

Q Commander, things are going along, you are not receiving any complaints regarding Officer Collins' work during these proceedings. Correct?

A Correct.

Q You investigate an anonymous letter, you address the concerns with Sergeant Lewis regarding the failure to provide activity logs. You bring this to Joyce Motley's attention.

She says, I've got it under control or I'm taking care of Collins, and it is basically business as usual. Would that be a fair statement?

A Under Joyce Motley, yes.

Q Nothing changed with respect to his work product for the Department. By that, I mean he was showing up at the schools like he was supposed to. He isn't receiving any complaints about not doing his job. Correct?

A Correct.

Q He is running or supposedly involved in his football programs, etcetera, as part of, in his mind, community relations activities. Is that correct?

A I can't speak to what is in his mind.

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Q Okay, but since you can't speak to what is in his mind, why would any individual have to come to the next commander and say this is what I've been doing and I want to keep doing it?

A Because it would be common sense to do that. As an officer, we give you a lot of responsibility--

Q Correct.

A --and we trust you to make the right decisions.

Q Correct.

A Working another job while he is working for me is wrong.

Q I didn't ask that question, Commander.

A Okay.

Q I asked the question regarding-- and this is limited to the football program that Ms. Jones brought up.

A Fine.

Q That's all I'm asking about.

A The football program.

Q Right. He is running it, and everything is going-- if that's what we're talking about. He has permission. It's been going on, you have confirmed that Motley was running the show with respect to Collins, and nothing has changed from that program.

I'm not talking about this other portion.

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MS. JONES: Lack of foundation.

We have not established that Motley, either through Motley's testimony or anyone else's testimony, gave him permission.

MR. GOLDPAUGH: We're not talking about when she gave permission. We also had testimony from retired Deputy Chief Motley, and she denies even the conversation that she had with Commander Dolunt. Yet, Commander Dolunt is saying these are the conversations I had.

So how do we jump from we can't confirm that she gave permission? She is saying these things never occurred.

I have no other questions of this witness.

MS. JONES: Nothing further.

Pass to the Panel.

INSPECTOR SROKA: Assuming there is a football program, which I don't think we have really established if there is or isn't, was it in the city or out of the city? There is a big difference.

MR. GOLDPAUGH: I agree.

INSPECTOR SROKA: Does anybody know?

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COMMANDER ENNIS: Do you understand the question, Commander?

INSPECTOR SROKA: Commander?

THE WITNESS: The City of Detroit has a football program.

INSPECTOR SROKA: That's not what I'm asking. Was--

THE WITNESS: He never told me.

INSPECTOR SROKA: So we don't know if he was involved in a football program?

THE WITNESS: I can't assume. I know Jerome coaches. I think he coaches basketball and he coaches football. He worked for PAL, so at one time, he probably coached a football team in the city of Detroit.

PAL doesn't do that any more.

So if he was doing it, a reasonable person would think that he was doing it on his own time. That's all I'm saying. I didn't sanction it. I didn't say, Collins, take so many hours a day and coach football. I never said that ever.

If he coached, God love him, because that's a good thing to help the youth, but you do it on your own time. Does that answer your question, sir?

21 (Pages 107 to 110)

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1 INSPECTOR SROKA: Well, if
2 there was a football program, yes.

3 I have one other question.

4 Were you in charge once the second letter came?

5 THE WITNESS: The second letter
6 came to Warren Evans, and then I was called and
7 said, hey, this letter came, what do you know about
8 this? It has been brought to your attention over a
9 year ago.

10 INSPECTOR SROKA: Were you in
11 charge of the Ninth Precinct?

12 THE WITNESS: Yes.

13 INSPECTOR SROKA: The Eastern
14 District at that time?

15 THE WITNESS: Yes, sir.

16 INSPECTOR SROKA: Did you guys
17 make any moves to tighten it up?

18 THE WITNESS: The second time,
19 the Chief's office called or Internal or someone
20 called and said, did you know about it? I said,
21 yes, I knew about it a year ago.

22 I thought Internal would look
23 into it, and they just didn't for whatever reason.
24 I said I'm well aware of it. We're making new run
25 sheets.

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1 Don't get me wrong, he was
2 still turning in run sheets that said he was doing
3 A, B, C and D. False, but he said he was doing
4 them.

5 MR. GOLDPAUGH: I'm going to
6 object to the characterization that they were false.

7 THE WITNESS: They were false.

8 MR. GOLDPAUGH: I'm going to
9 object.

10 COMMANDER ENNIS: Hold on, hold
11 on. The objection is sustained.

12 MR. GOLDPAUGH: Thank you.

13 COMMANDER ENNIS: Commander,
14 hold off on the editorials. Don't make--

15 THE WITNESS: He turned in run
16 sheets, he turned in activity logs.

17 COMMANDER ENNIS: Let the Board
18 make the decision on what happened.

19 THE WITNESS: Fair enough.

20 INSPECTOR SROKA: Was anybody
21 removed from a position in the Community Relations
22 group considering the allegations that were arising?

23 THE WITNESS: I don't recall.

24 INSPECTOR SROKA: That's all I
25 have.

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1 INSPECTOR BLACKMON: I have
2 just one question, or maybe more than one question.
3 The alleged conversation between you and former
4 Deputy Chief Motley, was there anyone else there
5 during that time?

6 THE WITNESS: Probably
7 Commander Moore.

8 INSPECTOR BLACKMON: That
9 statement that was made could have been heard by
10 Commander Moore?

11 THE WITNESS: I think so.

12 INSPECTOR BLACKMON: In regard
13 to the sanctioning or not sanctioning or whatever of
14 the football program, and this is speculation, if
15 the football program was in the city of Detroit,
16 would Officer Collins have been authorized to do
17 this during Department time?

18 THE WITNESS: If Officer
19 Collins would have come to me and said, Commander,
20 I'm in Community Relations, I'm coaching this
21 football team, I can do it X amount of hours a day,
22 can I adjust my hours so I can do this, I would
23 confer with Sergeant Lewis and say what does he do
24 specifically?
25 He is a school officer at

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1 Southeastern I believe. Can he do this, yea or nay,
2 and me personally, I probably would have said, you
3 know what, Collins, it's a good idea, yes, we can
4 pull it off, but just remember you're on duty, don't
5 do anything stupid, and this will be part of our
6 Community Relations program at the football field.

7 I don't see a problem with
8 that.

9 INSPECTOR BLACKMON: Would you
10 see a problem with that if there was compensation
11 involved in it?

12 THE WITNESS: Again, if he came
13 to me as a Community Relations officer and said,
14 listen, I want to start a program, and I want to
15 dedicate so many hours a day to it, this is what I
16 want to do, what do you think? I probably would
17 have double-checked with my boss, and we might be
18 able to work it through and pull this off.

19 I think his intent originally
20 was very good, it wasn't self-serving. I honestly
21 believe when he started this, he wanted it to be for
22 the kids. I honestly believe that. I've known him
23 for a long time. I like the guy.

24 But you still have a
25 paramilitary organization, and you've got to get

22 (Pages 111 to 114)

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1 permission. You just can't do what you want on your
2 own because you think you--

3 INSPECTOR BLACKMON: But my
4 question is, in that same scenario to where Officer
5 Collins is coaching a football program within the
6 city of Detroit, would you have seen an issue if
7 compensation was involved with that scenario?

8 THE WITNESS: If his hours
9 reflected that he was out there with the youth doing
10 these things, because football doesn't go all year,
11 it's three months, and then he could have said I
12 want to do a basketball team or a baseball team.

13 Cool, as long as it's part of
14 your job, and I think as a command officer it's
15 helping my community and getting kids off the
16 street, I'm all for it, and I'll pay him for it.

17 INSPECTOR BLACKMON: But what
18 if he is getting paid--

19 MS. JONES: I think we are
20 getting far afield on this, because the charges are
21 that he worked St. John's and worked Allen Academy
22 while he should have been at the Detroit Police
23 Department.

24 The fact that he had other
25 activities just enhances the number of hours he is

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1 doing all this stuff, but his charges are specific
2 to outside employment.

3 INSPECTOR BLACKMON: I agree,
4 and the only reason I'm asking that generalized
5 question, and that is, regardless of what you're
6 doing, if you are working and you have been given
7 the authority to do something that is not directly
8 police related but you're getting paid compensation
9 for that. That's my question. That's all.

10 INSPECTOR SROKA: There was an
11 allegation made that there was some use of
12 Department equipment that wasn't sanctioned, a la
13 the van. So that would, I think, lead to some of
14 the issues that are at hand in this.

15 MS. JONES: Okay.

16 MR. GOLDPAUGH: Just with
17 respect to the term of not sanctioned.

18 INSPECTOR SROKA: Well, he
19 didn't have approval to use the van.

20 MR. GOLDPAUGH: Whether it
21 would be an issue or not, as far as that's
22 concerned, I understand, but there has been no
23 allegation that he improperly used Department
24 equipment is what I'm trying to say.

25 You said there has been an

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1 allegation. There has been nothing in the charges
2 with respect to that.

3 INSPECTOR SROKA: There is
4 nothing in the charges, but it was brought up.

5 MR. GOLDPAUGH: It was brought
6 up that he was using the van, correct.

7 INSPECTOR SROKA: And I believe
8 there was no authorization.

9 MR. GOLDPAUGH: The question
10 was he was using it, and he said yes, he was. He
11 doesn't know if he was authorized or not to use it.

12 COMMANDER ENNIS: Commander, I
13 heard the term "flex hours." That was used earlier
14 when you began testifying. Just for the sake of
15 clarity, what do you mean by flex hours?

16 THE WITNESS: Now, we are
17 scheduled 11:00 to 7:00. If there is a Community
18 Relations meeting, I will adjust their hours to come
19 in later, flexible hours. If something is going on
20 in early morning, they will come in early morning,
21 and we will adjust their hours. They have flexible
22 hours.

23 COMMANDER ENNIS: When the
24 hours are flex, is it normal that they would reflect
25 the different hours on their activity log?

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1 THE WITNESS: Absolutely.

2 COMMANDER ENNIS: Do you know
3 or do you have any personal knowledge as to whether
4 or not the daily detail was changed to reflect if
5 they were flexing their hours?

6 THE WITNESS: No.

7 COMMANDER ENNIS: Did you-- or
8 was there a prohibition during your tenure regarding
9 any overtime for Community Relations officers either
10 working over late or not?

11 THE WITNESS: It depended on
12 the circumstances. If they made an arrest or
13 something of that nature, I would pay them overtime.
14 But sometimes they would say we're doing this over,
15 they would just make it up. Instead of getting paid
16 overtime, we would adjust the hours for tomorrow,
17 yes.

18 COMMANDER ENNIS: Were you ever
19 approached by Sergeant Lewis or Lieutenant Williams
20 regarding allowing officers in Community Relations--
21 well, not officers-- Officer Collins in Community
22 Relations to have slide time?

23 THE WITNESS: Particularly
24 Officer Collins about slide time, I don't believe
25 so.

23 (Pages 115 to 118)

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1 COMMANDER ENNIS: By slide
2 time, for definition purposes meaning giving
3 somebody the authority to leave earlier from work or
4 come in late and not having it docked out of any of
5 their banks, whether it's comp time or whatever bank
6 is going to be used, or vacation pay?

7 THE WITNESS: As it pertains
8 just to Officer Collins, I would say no.

9 COMMANDER ENNIS: I have
10 nothing else. Thank you.

11 MS. JONES: I have a question.

12 REDIRECT EXAMINATION

13 BY MS. JONES:

14 Q As it relates to PAL and Community Policing, was PAL
15 still in existence when the Community Policing
16 program started?

17 A I'm not sure.

18 Q Was PAL primarily athletics versus Community
19 Policing being other events such as community
20 meetings and things of that nature, going to
21 schools?

22 A PAL would have been separate, yes.

23 COMMANDER ENNIS: Counsel,
24 anything else?

25 MR. GOLDPAUGH: Yes.

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1 RECROSS-EXAMINATION

2 BY MR. GOLDPAUGH:

3 Q Would you determine that-- based on this last line
4 of questioning, would you determine that Community
5 Relations would be more expansive than PAL?

6 A Yes.

7 Q PAL deals mainly with athletics. Community
8 Relations deals with athletics as you have indicated
9 and has more to it than that. Would that be a fair
10 statement?

11 A Community Relations is broader, yes.

12 Q But it would not be exclusively athletics, Community
13 Relations?

14 A I don't believe so.

15 MR. GOLDPAUGH: Nothing else.

16 MS. JONES: Now, I guess we're

17 done.

18 COMMANDER ENNIS: Thank you,
19 Commander.

20 (At 11:35 a.m., witness
21 excused)

22 MS. JONES: I will call
23 Lieutenant Moore.

24 MR. GOLDPAUGH: If I may have
25 two minutes?

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1 COMMANDER ENNIS: Certainly.

2 (At 11:35 a.m., off the record)

3 (At 11:37 a.m., back on the
4 record)

5 UNIDENTIFIED: Raise your right
6 hand. Do you swear or affirm that the testimony you
7 are about to give this Board is the truth?

8 LIEUTENANT MOORE: I do.

9 JAMES MOORE

10 (At 11:37 a.m., sworn as a witness, testified
11 as follows)

12 DIRECT EXAMINATION

13 BY MS. JONES:

14 Q Please make sure that you respond verbally, no nods
15 or shakes of the head and no um-hums or uh-huhs
16 because you are being recorded, and we need a verbal
17 response. Do you understand?

18 A Sure.

19 Q Thank you. If you will please state your name for
20 the record?

21 A James Moore.

22 Q What is your badge and rank?

23 A Lieutenant, badge L-181.

24 Q That is with the Detroit Police Department?

25 A Yes.

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1 Q How long have you been with the Detroit Police
2 Department, sir?

3 A I'm in my 36th year.

4 Q Prior to your being a lieutenant, were you a
5 commander?

6 A Yes.

7 Q Where were you a commander at?

8 A Eastern, Western, Patrol Operations.

9 Q Let's focus on Eastern District. When were you at
10 Eastern District?

11 A I went to the Eastern District after I was promoted
12 in December of 2007. I stayed there for
13 approximately three years, a little longer maybe.

14 Q While there, did you happen to know an officer by
15 the name of Jerome Collins?

16 A Yes.

17 Q How do you know him?

18 A I met him years before that, but at the district, he
19 was a police officer assigned to the Community
20 Relations Unit.

21 Q You say you met him years before. Where did you
22 meet him before that?

23 A I think we originally met at 36th District Court.

24 Q So you have known him for some time?

25 A Yes.

24 (Pages 119 to 122)

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- 1 Q As a police officer at the Community Relations Unit,
2 was he to report directly to you?
3 A No.
4 Q Who would he report to?
5 A The sergeant that was in charge.
6 Q Would that be Mattie Lewis?
7 A I believe that is her name, yes.
8 Q Did Mattie Lewis, at any point in time, come to you
9 and advise that he was not to report to her, he was
10 to report to someone else?
11 A No.
12 Q Did she come to you and tell you that she was having
13 problems with him or locating him at any time?
14 A No.
15 Q At some point in time, did you have problems
16 locating him?
17 A No, I didn't have problems locating him. At some
18 point in time, I had questions because I rarely saw
19 him. So I inquired as to where he was.
20 Q Would you see the other Community Relations officers
21 from time to time?
22 A A lot more frequently, yes.
23 Q So as it relates to him, you questioned where he
24 might be?
25 A I questioned how come I didn't see him as frequently

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- 1 as I saw the others.
2 Q Why would you question that?
3 A Because you get used to seeing people. We are all
4 working out of a building, everybody comes in or out
5 of the building frequently. You get used to seeing
6 people, and when you don't see people, you ask
7 what's going on or where are they.
8 I think there were close to 300
9 people assigned there that we were responsible for.
10 When you have the IOU and all the shifts, you just
11 try to keep up with everybody.
12 Q When you say we were responsible, who are you
13 referring to?
14 A Originally, myself, Commander Dolunt and Deputy
15 Chief Joyce Motley.
16 Q When did Motley leave if you recall?
17 A I want to say September of 2008.
18 Q So after that, who replaced her?
19 A No one.
20 Q So it was just you and Dolunt?
21 A Yes.
22 Q Did there come a time that there was a conversation
23 between either yourself and Motley or Dolunt and
24 Motley where there was a conversation to leave
25 Collins solely to her, and she will handle him?

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- 1 A There was a conversation because I think we were
2 talking at one point and the issue came up how come
3 we never see this guy, and we were told that
4 Community Relations was up under her, don't worry
5 about it.
6 We had the shifts, I think I
7 had platoon three and four, Dolunt had platoons one
8 and two, and Community Relations and administrative
9 staff people were assigned to her. She had that.
10 Q So when she said don't worry about it, it wasn't
11 necessarily Collins she was referring to, it was--
12 MR. GOLDPAUGH: I'm going to
13 object to the speculation. She can ask a question,
14 but she can't lead him to an answer she wants.
15 MS. JONES: Okay, I will
16 rephrase.
17 Q (By Ms. Jones) When you just said that she said CR
18 is up under her, don't worry about it, was she
19 referring to CR in its entirety or any specific
20 officer?
21 MR. GOLDPAUGH: I'm going to
22 object because he can't go into her particular mind.
23 He can't say what was in her mind.
24 Q (By Ms. Jones) What is your understanding of the
25 conversation, sir?

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- 1 A I took it to mean both.
2 Q Why is that?
3 A Because Deputy Chief Motley was not one to mince
4 words. She is very clear when she gave directives,
5 and when she said don't worry about that, that's up
6 under me, she didn't only say that-- we were
7 discussing an individual, and she took it to the
8 unit as well as the administrative part of the
9 building.
10 Therefore, she wasn't only
11 speaking of the people who worked in that capacity,
12 she was talking about those entities at large to me.
13 Q After she left, did you take any action-- did you or
14 do you know if anyone else took action to find out
15 what Collins was doing?
16 A Yes. There was some conversation, it may have even
17 taken place with Sergeant Lewis, I'm not sure, but I
18 think we did initially say, okay, we expect to see
19 more of this person, because we want to know what is
20 going on.
21 Q Did you see more of him after that?
22 A No. That did not materialize. What we were told
23 was or what I was told was-- we have this old
24 Community Relations van, and Jerome is one of those
25 people that don't like to hang around the station.

25 (Pages 123 to 126)

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1 All the things that I have
2 assigned for him to do, when he comes in, he grabs
3 that stuff, he gets in the van, and he's gone. When
4 he comes back, it's all done, and if you have
5 something you want him to do, let me know, I'll give
6 it to him, it will get done.

7 That's my recollection of what
8 she said.

9 **Q So that is what Sergeant Lewis advised you that it
10 would be taken care of?**

11 **A** Right. Each one of our people were given specific
12 tasks, and she split the work up among those
13 individuals, and her job was to manage it and make
14 sure that it was all done.

15 She assured me that he was
16 getting his share of the work, but he was not one of
17 those kind of people who would hang around the
18 station and mill around, drink coffee and socialize.
19 He took that old van, and he went out and did what
20 needed to be done.

21 **Q Do you know how this was getting done? Did she
22 advise how everything was getting done?**

23 **A** No. Community Relations primarily would handle a
24 lot of the nuisance complaints that we got in the
25 district, the junk cars, the overgrown weeds, issues

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1 like that.

2 **Q Environmental issues?**

3 **A** Environmental issues, right. According to her, his
4 run sheet would indicate that he had done these
5 things. There would be ordinances issued sometimes
6 for those issues and, whenever she went back and
7 spot checked to see whether or not it was true, she
8 didn't find any discrepancies.

9 **Q You are sure that she went back and spot checked?**

10 **MR. GOLDPAUGH:** I'm going to
11 object. It calls for--

12 **THE WITNESS:** I never followed
13 her or had anybody spot check what she spot checked,
14 no.

15 **COMMANDER ENNIS:** Do you
16 withdraw your objection?

17 **MR. GOLDPAUGH:** That's okay, I
18 will withdraw it.

19 **THE WITNESS:** Sorry about that.

20 **COMMANDER ENNIS:** That's okay.

21 **Q (By Ms. Jones) As it relates to the investigation
22 that lead to the charges here today, were you aware
23 that he was working at St. John's Hospital and at
24 Allen Academy?**

25 **A** No.

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1 **Q Were you aware that any of the hours that-- were you
2 aware that he applied for permission to do outside
3 employment?**

4 **A** No, not to my recollection.

5 **Q Did you do any investigation on your own?**

6 **A** No. I requested one. I recall contacting Internal
7 Affairs and advising them of the situation, that
8 maybe we need to take a look at this.

9 **Q Did they?**

10 **A** When I got back to them, they did tell me yes, they
11 did.

12 **Q What did they find?**

13 **A** They told me that the results of their investigation
14 was negative. I inquired what kind of investigation
15 did you all do?

16 They told me that they had a
17 full investigation including putting a surveillance
18 team on him that had, I guess, followed him for a
19 period of time, and they didn't see anything out of
20 the ordinary.

21 **Q Did there come a time that you found out there was
22 something out of the ordinary going on?**

23 **MR. GOLDPAUGH:** I'm going to
24 object to the characterization of something out of
25 the ordinary. He can only testify--

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1 **COMMANDER ENNIS:** Sustained.

2 Will you rephrase the question?

3 **Q (By Ms. Jones) Did you, at some time, find out that
4 Collins was doing something while he should have
5 been working at the Detroit Police Department?**

6 **A** There was a point at which we received a letter, and
7 it had some allegations that there was more going on
8 than should be going on, yes.

9 **Q What did that letter consist of?**

10 **A** An allegation that there was something going on in a
11 sports league or something and something going on
12 with some little league teams and maybe working
13 outside of-- I can't remember, to be honest with
14 you. It was a long time ago.

15 **Q That's fair.**

16 **A** I mean I really can't. I would be guessing. But I
17 can just tell you that I took it and forwarded it to
18 the people who were responsible for doing an
19 investigation into it.

20 **Q Okay. To this day, are you aware that he was
21 working the two other jobs?**

22 **A** Yes. It was brought to my attention that there was
23 some outside employment going on.

24 **Q Do you have any personal knowledge that his time
25 that he was working at these other jobs overlapped**

26 (Pages 127 to 130)

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1 the time he should have been working at the Detroit
2 Police Department?

3 A I don't have any personal knowledge of it at all,
4 no. I was not involved in the investigation. At
5 some point while it was ongoing, I was transferred
6 out of the Eastern District.

7 MS. JONES: Pass the witness.

8 CROSS-EXAMINATION

9 BY MR. GOLDPAUGH:

10 Q Hello, sir.

11 A Hi, how are you?

12 Q You indicated that you have known Officer Collins
13 for a lengthy period of time. Correct?

14 A Yes.

15 Q That you first met him, I believe, at 36th District
16 Court?

17 A Yes.

18 Q Then you went down your different paths, and
19 eventually you reunited, so to speak. Were you
20 working at 36th District Court?

21 A No. If I'm not mistaken, he was a security guard at
22 36th District Court at some point in his career, and
23 I was a police officer that went to 36th District
24 Court all the time to testify, and I would see him
25 there. That is how we initially met.

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1 Q So he was assigned when DPD was originally doing the
2 36th District Court. That's how you met him?

3 A No. He wasn't working for DPD.

4 Q Oh, so you have known him even longer than the 20
5 years that he has been on the job?

6 A That's my recollection, yes.

7 Q I'm sorry, I misunderstood your answer. Other than
8 the Ninth Precinct, or Eastern District, did you
9 ever work together as police officers?

10 A No. It is my understanding that he came on the job,
11 and I remember seeing him one day in a police
12 uniform, and I said, oh, you came on the job. Then
13 he worked PAL and other things, and I never worked
14 with him at all.

15 Q As you indicated, he worked PAL. What did he do
16 with PAL if you know?

17 A Whatever officers assigned to PAL do. I don't know.

18 Q Was he running basketball leagues and football
19 leagues?

20 A I would assume they would have some input into that
21 kind of stuff, but I don't know.

22 MS. JONES: Objection. He
23 indicated--

24 COMMANDER ENNIS: It is
25 sustained.

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1 Q (By Mr. Goldpaugh) There comes a point in time when
2 he is now working for you though. Get to that
3 point, get to the Eastern District.

4 A There comes a point in time where now he is assigned
5 under my sphere of control, yes.

6 Q That was approximately 2008 I believe, 2007?

7 A The end of 2007 or January of 2008, either December
8 or January when I finally showed up over there.

9 Q You and Commander Dolunt were the commanders at the
10 Eastern District, and Deputy Chief Motley was
11 basically running the district. Right?

12 A Yes. She was the deputy chief.

13 Q It is my understanding from your testimony and the
14 testimony of others that there became a concern
15 about the whereabouts of Officer Collins as a
16 Community Relations officer. Is that correct?

17 A Okay. That's a fair characterization. I mean not
18 necessarily his whereabouts but just the fact that
19 we didn't see him.

20 Q That's what I mean. I guess that's his whereabouts,
21 and that is why I say that. You are seeing Officer
22 Collins a lot less frequently than you are, say,
23 Officer Smith, and I'm making that name up?

24 A Let's say we have one of our big Community Relations
25 meetings. We have a big Community Relations meeting

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1 and, all of a sudden, there is Officer Collins, and
2 you go where the hell has he been for the last 90
3 days? I don't recall seeing him.

4 Q I understand, and you brought this to-- because
5 Sergeant Lewis was in charge of Community Relations
6 at that time. Right?

7 A Yes.

8 Q What about Lieutenant Williams, was she involved in
9 Community Relations at all?

10 A I'm not sure. I don't think so. She may have been,
11 but I don't think so.

12 Well, at some point, she became
13 the administrative lieutenant and, if I'm not
14 mistaken, Community Relations would report to the
15 administrative lieutenant which would then go to the
16 deputy chief.

17 Q You had some conversations with Sergeant Lewis
18 regarding this, is that correct, about the
19 whereabouts or why don't I see Officer Collins as
20 frequently as others?

21 A Eventually, yes, I did make an inquiry.

22 Q In fact there came a point in time when you brought
23 this, specifically with respect to Officer Collins,
24 to Deputy Chief Motley. Is that correct?

25 A Yes.

27 (Pages 131 to 134)

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1 Q When you spoke to Chief Motley regarding this, was
2 Commander Dolunt present?

3 A I believe so.

4 Q When this came to your attention, Commander Motley
5 spoke to you and said, I got that, don't worry about
6 it. Is that correct?

7 A I'm not quoting her, but that's the way I took it.
8 She told us basically that was up under her, that's
9 hers, and we had our assignments. Do what you're
10 supposed to do, and I've got my piece.

11 Q Right, but I can show you this if you would like,
12 and you can review this to refresh your memory.
13 This is a copy of the Garrity interview that you
14 gave.

15 You don't need to read the
16 whole thing, but the bottom part is the highlighted
17 part and a little bit into the next page if you want
18 to review that for a second to refresh your memory
19 regarding that incident.

20 A Her position was--

21 Q I will ask you some questions, but I just want you
22 to read that to yourself for a second.

23 A The highlighted portion.

24 Q In fact why don't you read the highlighted portion
25 just to refresh your memory, and then go on to the

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1 next page through a little bit there?

2 A (Witness complied) Okay.

3 Q Does that refresh your memory as to the subject
4 matter of the conversation with Deputy Chief Motley?

5 A Yes. The subject matter was Officer Collins.

6 Q That's what I mean. The subject matter was Officer
7 Collins, not the general running of Community
8 Relations. Correct?

9 A Yes.

10 Q So when she was answering your questions or your
11 concerns, she said, I got him, I give him stuff, he
12 does these things. Is that correct?

13 A That's not what I said. Let me share this with
14 you--

15 Q Let me ask a question, please. Is that what you
16 told Internal Affairs?

17 A Not to my knowledge. What I told Internal Affairs
18 is that she said, I got that, don't worry about it.

19 Q Right, and then she went on to say, I give him
20 stuff, and things like that. Correct?

21 A Let me say this. You are asking me what it says
22 here. Right? Now, I see that.

23 Q No, I'm not asking that. I'm asking you if that
24 refreshes your memory as to what was said? Did you
25 give a Garrity statement?

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1 A I gave a Garrity statement years after the
2 conversation that we had.

3 Q I understand that, trust me. I understand that, but
4 did you tell Internal Affairs during the
5 investigation that this is what Deputy Chief Motley
6 said?

7 MS. JONES: May I see that?

8 MR. GOLDPAUGH: This purports
9 to be a transcript of his Garrity interview.

10 Q (By Mr. Goldpaugh) Did you have a chance to review
11 this?

12 A Yes.

13 Q The reason I ask this is because you told Internal
14 Affairs in the Garrity interview-- and I know time
15 goes by in all these conversations--

16 MS. JONES: The actual Garrity
17 would be the better--

18 MR. GOLDPAUGH: I can show him
19 anything I want to refresh his memory. If you want
20 to take the time to play the Garrity tape, that's
21 fine.

22 COMMANDER ENNIS: For the
23 edification of the Board, we haven't seen it. Have
24 you got a copy? Is that the transcript of--

25 MR. GOLDPAUGH: This is a

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1 transcript of the Garrity interview. I received a
2 copy of his Garrity interview as part of discovery.

3 I have taken the time to
4 transcribe it so I can use this. That is the tape.
5 The tape is not being admitted because that's not
6 evidence. He is here to testify. I have shown him
7 something to refresh his memory if need be as to
8 what he said.

9 On direct testimony, Ms. Jones
10 asked a series of questions regarding this
11 conversation, and then Ms. Jones, in her
12 questioning-- and then the response was that she,
13 meaning Deputy Chief Motley, was talking about the
14 situation of the running of Community Relations as
15 opposed to a specific discussion regarding what his
16 opinion was, which I objected to and was allowed in,
17 as to what she, meaning Motley, was talking about
18 when she made these statements.

19 It was answered in a way which
20 I do not believe was consistent with what he said
21 here, because the answer was he believed that what
22 Deputy Chief Motley was talking about was the entire
23 running of Community Relations, and that is not what
24 this says.

25 MS. JONES: Actually, that is

28 (Pages 135 to 138)

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1 what it says--

2 MR. GOLDPAUGH: No, it doesn't.

3 MS. JONES: --on the following

4 page.

5 MR. GOLDPAUGH: It does not,
6 but that's okay. We are talking about this portion
7 of what he said.

8 COMMANDER ENNIS: All right,
9 let's proceed.

10 Q (By Mr. Goldpaugh) Did you tell Internal Affairs
11 that when you told them:

12 "We had expressed some concerns about
13 the fact that we didn't see him, you know,
14 as frequently as we saw everybody else.
15 Actually, you know, it was very infrequent
16 that we saw him, you know, and we asked
17 where he is, and he's handling stuff, don't
18 worry about it."

19 Is that what you recall her answer was?

20 A Yes.

21 Q Were you then asked this question by Internal
22 Affairs saying:

23 "Okay, so she didn't expound on anything
24 else of what he might be doing for her or
25 anybody else?"

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1 Your answer was no, and then you went on to give
2 some more information. Would that be a fair
3 recitation?

4 A Okay.

5 Q Now, Deputy Chief Motley left. Correct?

6 A Yes.

7 Q Then you and Commander Dolunt took over. By that, I
8 mean you shared responsibilities for running the
9 district. Would that be a fair statement?

10 A Yes.

11 Q There comes a point in time when you receive an
12 anonymous letter, is that right, regarding Jerome
13 Collins?

14 A Yes.

15 Q And dealing with outside employment or something
16 along those lines about a basketball camp or
17 something along those lines?

18 A Yes.

19 Q What did you do with that information, if anything,
20 if you recall?

21 A We discussed it, and we decided it would be better
22 handled if we sent it over to Internal Affairs,
23 because we felt it was their responsibility to do
24 those investigations, not ours, and we gave it to
25 them.

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1 Q Okay, and I understand.

2 A We called Commander Stair and let him know that it
3 was coming, and we sent it over.

4 Q Then it came back, hey, there is nothing here.
5 Correct?

6 A No.

7 Q Well, didn't you say that they said we did it, and
8 we can't find anything?

9 A I said that after a period of time, and we hadn't
10 heard from them about what was going on, we
11 contacted them to find out what was going on.

12 Q All right.

13 A That is when we were advised.

14 Q So you followed up on what you were looking for and
15 found out that they couldn't find anything
16 supposedly. Correct?

17 A They found nothing.

18 Q Now, this was in 2008 I guess?

19 A I'm not sure.

20 Q Did there come a point in time when you learned that
21 nobody was doing activity logs for Community
22 Relations?

23 A No.

24 Q Did there come a point in time after this anonymous
25 letter where there were allegations that he had

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1 outside employment and wasn't doing what he was
2 supposed to be doing with respect to Community
3 Relations? Is that correct?

4 A There did come a time where that occurred.

5 Q That was before the second letter was sent
6 triggering this investigation. Is that right?

7 A No. I don't understand what you're saying.

8 Q Let me rephrase. Did there come a point in time
9 where you and Commander Dolunt, in conjunction with
10 what was going on with Community Relations as a
11 whole, decided to make some changes for
12 accountability purposes?

13 A I don't recall.

14 Q Do you recall a change when the officers, including
15 Officer Collins, were directed to make sure they did
16 their activity logs and to appear and turn these
17 things in or to appear and get their assignments
18 from Sergeant Lewis or Lieutenant Williams?

19 A Yes.

20 Q That was before the second letter that triggered the
21 Internal Affairs investigation from Chief Evans.
22 Correct?

23 A I believe so.

24 Q Once Deputy Chief Motley left, the members of the
25 Community Relations Section or Unit were all

29 (Pages 139 to 142)

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1 specifically assigned by previous command staff. Is
2 that correct?

3 A Yes.

4 Q In other words, members of Community Relations
5 basically sat at the pleasure of the commander.
6 Would that be a fair statement?

7 A No.

8 Q You could go up and say you will no longer be a
9 Community Relations officer. Correct?

10 A No. That is not my understanding.

11 Q If you were the commander of the precinct? That's
12 an exempt unit, isn't it?

13 A Not to my understanding. My understanding was there
14 was negotiations that took place prior to turning
15 precincts into districts.

16 Part of those negotiations were

17 the discussion of Community Relations and how many
18 of those people would be selected by the commander
19 as well as how many would be allowed to go in by
20 seniority. Even then--

21 Q I understand. So it was not your understanding that
22 they sat at your-- okay, that's fine. I don't know
23 if it was, I was just asking that question. That's
24 fine.

25 Did you ever have a

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1 Q (By Mr. Goldpaugh) There came a point in time when
2 you then learned that activity logs weren't being
3 done by at least Officer Collins. Would that be a
4 fair statement?

5 A Yes.

6 Q Then you directed at least Officer Collins through
7 Sergeant Lewis to make sure his activity logs were
8 being done, and she--

9 A That's not what I meant.

10 Q That's not what you meant?

11 A No, that's not what I meant.

12 Q What did you mean by that then?

13 A What I meant by that was what I said earlier. We
14 didn't see him, and when I discussed it with her,
15 she said that what she needed him to do, she was
16 giving him assignments, and it was getting done.

17 I told her, well, then make

18 sure if he's doing it, then his activity log should
19 reflect that he's doing it, where he is doing it and
20 what days he did it on. Make sure that you've got
21 those because then you can go back and check those
22 places to make sure that what he said he did he did.

23 Q Okay, that's fine.

24 A That's what I meant.

25 MR. GOLDPAUGH: I understand

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1 conversation with Sergeant Lewis regarding Jerome
2 Collins specifically and directions she received
3 from either then Commander Godbee or Deputy Chief
4 Motley with respect to who Officer Collins was
5 supposed to report to?

6 A I had a lot of conversations with Sergeant Lewis,
7 but I don't recall one specifically as to whether he
8 was supposed to report to-- he was supposed to
9 report to her in my mind. She was his immediate
10 supervisor.

11 Q Right. My question was, did she ever tell you that
12 she was talking to other people, and she was told by
13 those two specifically he is to report to them, and
14 they will handle it. You are saying you don't
15 recall that conversation?

16 A No, not to my recollection.

17 Q I may have asked this question and you indicated you
18 didn't recall about the activity logs. Would you
19 just read that to yourself and see if that refreshes
20 your memory regarding that issue, the part above the
21 highlighted part.

22 MS. JONES: What are you
23 highlighting?

24 MR. GOLDPAUGH: This part.

25 THE WITNESS: Okay.

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1 that. Thank you.

2 MS. JONES: Briefly. Counsel
3 has been referencing a transcript that his office
4 provides to him as it relates to a Garrity statement
5 that this witness gave previously, his prior
6 statement.

7 I am moving to admit this prior
8 statement because there has been reading of the
9 transcript without the whole thing being placed in
10 the context. So I would like to admit that as
11 Department Exhibit No. 14.

12 (At 12:09 p.m., DX#14 marked)

13 MR. GOLDPAUGH: I am objecting
14 totally to this. This is not an exhibit. This is a
15 transcript that I prepared off a document that I
16 received during discovery. This was his Garrity
17 statement.

18 Therefore, I can show him
19 anything I want to refresh his memory, and that is
20 all I did. I told him specifically to please read
21 this to yourself, and then I will ask questions.

22 I did not ask him, and he did
23 not do that, read this in as testimony. Clearly,
24 this is an attempt to improperly enter a Garrity
25 statement, and that is all this is. If Ms. Jones

30 (Pages 143 to 146)

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1 and her staff wanted to take the same situation and
2 transcribe the document, she could have done it.

3 I have on numerous occasions
4 done that, particularly with the officers' Garrity
5 statements that are going to be admitted, and it has
6 been made clear that is not an exhibit, but rather
7 it is to help the trier of fact so they won't have
8 to listen to the whole thing if they don't want to.

9 There is no basis in
10 evidentiary rules or arbitration rules or any other
11 reason to submit this transcript or to submit the
12 tape under those circumstances. I showed it to him
13 to refresh his memory. He could have said yes, no,
14 or indifferent.

15 In fact on one occasion, he
16 didn't testify that he didn't say what is in that
17 statement, he gave his explanation of what he meant
18 by that. I didn't cut him off. I didn't try to
19 shut him down. I allowed him to testify as to what
20 he meant when he gave that statement. That's all.

21 MS. JONES: In reply, I'm not
22 saying that he read it into the record. He read it
23 into the record, and he read it and asked questions
24 out of context as to what was said, and that is why
25 this should go in.

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1 MR. GOLDPAUGH: If she wants to
2 get up there and-- no, it shouldn't go in. If she
3 wants to stand up there and say, okay, here is the
4 tape, listen to the tape, and isn't this what you
5 really meant, that's fine.

6 But to say because I picked
7 something out of a document that she has just as
8 much access to and talked about it doesn't
9 automatically make that document admissible.

10 MS. JONES: I will defer to the
11 Board.

12 COMMANDER ENNIS: The first
13 question, counselor: Your notes and your
14 transcription of the Garrity tape was done by your
15 office.

16 MR. GOLDPAUGH: Correct.

17 COMMANDER ENNIS: It was done
18 based on reviewing the Garrity tape and so forth.

19 MR. GOLDPAUGH: Yes.

20 COMMANDER ENNIS: Do you have a
21 specific prohibition on allowing the Board to hear
22 the entire Garrity?

23 MR. GOLDPAUGH: Yes, I do, and
24 the reason is because the Garrity tape and the
25 Garrity statement, whether it be recorded, whether

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1 it be transcribed or whatever, is not the evidence.
2 It is not the exhibit.

3 His testimony is what is at
4 stake here or is what is reviewed here. Had he said
5 that's not true, I never said any of this, it
6 wouldn't have made any difference, because the only
7 evidence is what is coming out of the witness'
8 mouth, not what is on some tape or something that is
9 transcribed.

10 I showed him this document to
11 refresh his memory as to what he purportedly said on
12 the tape. Purportedly, that is what is on this
13 tape, these words. That is all I did.

14 I even, as I said, allowed him
15 to go on when he said this is what I meant by what I
16 said.

17 COMMANDER ENNIS: I understand.

18 Do you have a response?

19 MS. JONES: No.

20 COMMANDER ENNIS: I will
21 overrule the objection.

22 MS. JONES: Thank you.

23 (At 12:11 p.m., DX#14 received)

24 MS. JONES: I have another
25 question.

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REDIRECT EXAMINATION

1 BY MS. JONES:

2 **Q Do you know who handled the initial investigation as**
3 **it relates to-- you said there was some type of**
4 **surveillance team, IA investigation?**

5 A Yes.

6 **Q Do you know who handled that?**

7 A No, I don't. There was a sergeant over there
8 handling the surveillance.

9 **Q There was a sergeant that handled the surveillance?**

10 A I can't remember his name. I don't think he's on
11 the job any more.

12 **Q Counsel asked you something about Community**
13 **Relations officers sitting at the pleasure of the**
14 **commander. If that had been the case, could you**
15 **have removed him?**

16 MR. GOLDPAUGH: I'm going to
17 object only because he doesn't believe he could.

18 MS. JONES: That's my question
19 to him.

20 MR. GOLDPAUGH: I asked him
21 that question, doesn't he sit at the pleasure, and
22 he said I don't think so, no. So he doesn't think
23 he has the authority to do it. So it doesn't make
24 any difference.
25

31 (Pages 147 to 150)

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1 COMMANDER ENNIS: Sustained.
 2 MS. JONES: Nothing further.
 3 Pass to the Board.
 4 MR. GOLDPAUGH: My objection is
 5 on the record in regard to the Garrity tape.
 6 COMMANDER ENNIS: Your
 7 objection is noted. Any questions, Inspector?
 8 INSPECTOR BLACKMON: The first
 9 investigation that Internal did, what predicated
 10 that? What caused that to be generated?
 11 THE WITNESS: I think my
 12 recollection is it was just our curiosities. We
 13 didn't see him, and we wanted to know what was going
 14 on. We called over there. But then, again, it
 15 might have been because we got a note.
 16 Steve got information that he
 17 shared with me. I got information that I shared
 18 with him, and it was a long time ago. Did I make a
 19 specific note of it? No. I mean it is fading to be
 20 honest with you.
 21 But the bottom line is that we
 22 didn't see him the way we felt we should. We made
 23 inquiries. We didn't get answers that satisfied us.
 24 Therefore, we asked those people whose
 25 responsibility it is to take a deeper dive.

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1 INSPECTOR BLACKMON: My
 2 question was what were they looking for when they
 3 were initially investigating? What were they
 4 looking to discover? Because when you say they
 5 didn't find anything, what were they looking to
 6 discover?
 7 THE WITNESS: We were looking
 8 to see whether or not this person is where they are
 9 supposed to be and doing what they are supposed to
 10 be doing.
 11 If they followed him for a week
 12 and saw that he came to work, walked in there, got
 13 his stuff, got in that van and went out and did all
 14 of his work, came back, dropped it off, and he is
 15 only in the station seven minutes out of the day
 16 because he was dropping off and picking up, then
 17 that's fine.
 18 But if they followed him all
 19 day long and found out he was doing something other
 20 than that, then that's what we were trying to find
 21 out without having to do it ourselves. What is he
 22 doing?
 23 INSPECTOR BLACKMON: So to your
 24 knowledge, they weren't looking at whether or not he
 25 was working somewhere else other than DPD at that

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1 time?
 2 THE WITNESS: They should have
 3 been looking to discover whatever was going on. In
 4 other words, if you wake somebody up and you put
 5 them to bed with a surveillance team, no matter what
 6 they do, you're going to discover it.
 7 INSPECTOR BLACKMON: Based on
 8 what they told you, they didn't see anything at that
 9 time?
 10 THE WITNESS: That's what they
 11 told us. When we got back, we said, okay, then
 12 everything must be good. But when things went on
 13 and on, at some point, of course, we said, well,
 14 what the hell was the surveillance?
 15 Then that is when we found out
 16 that they had discovered some place in Canton or
 17 something, and they weren't actually following him,
 18 they were sitting on a building waiting for him to
 19 show up when he should.
 20 COMMANDER ENNIS: Anything
 21 else, counsel?
 22 MS. JONES: Nothing else from
 23 me.
 24 COMMANDER ENNIS: Sitting on a
 25 building. Thank you, Commander, you're excused.

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1 (At 12:19 p.m., witness
 2 excused)
 3 COMMANDER ENNIS: How many more
 4 witnesses do you have?
 5 MS. JONES: Two.
 6 COMMANDER ENNIS: How long?
 7 MS. JONES: Todd is the OIC,
 8 and Whitney.
 9 COMMANDER ENNIS: That's going
 10 to be long. We are adjourned till 1:30.
 11 (At 12:19 p.m., recess taken)
 12 (At 1:49 p.m., back on the
 13 record)
 14 COMMANDER ENNIS: Back on the
 15 record.
 16 MS. JONES: The Department
 17 calls Todd Svenkesen to the stand.
 18 UNIDENTIFIED: Raise your right
 19 hand. Do you swear or affirm that the testimony you
 20 are about to give the Board is the truth?
 21 SERGEANT SVENKESEN: I do.
 22 TODD SVENKESEN
 23 (At 1:50 p.m., sworn as a witness, testified
 24 as follows)
 25 DIRECT EXAMINATION

32 (Pages 151 to 154)

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1 BY MS. JONES:
 2 **Q Please state your name for the record so that we all**
 3 **know how to pronounce it?**
 4 A Todd Svenkesen.
 5 **Q What is your rank?**
 6 A Sergeant.
 7 **Q Can you spell Svenkesen for the court reporter,**
 8 **please?**
 9 A S-v-e-n-k-e-s-e-n.
 10 **Q Thank you. Do you work for the City of Detroit**
 11 **Police Department?**
 12 A Yes.
 13 **Q For how long?**
 14 A About 16 years.
 15 **Q Where are you currently?**
 16 A Internal Affairs.
 17 **Q How long have you been in Internal Affairs?**
 18 A About four to four-and-a-half years.
 19 **Q Before that, where were you?**
 20 A TAC Mobile.
 21 **Q In Internal Affairs, what are your duties?**
 22 A Investigations.
 23 **Q Of what?**
 24 A Possible criminal activity.
 25 **Q That would be criminal activity by police officers?**

1 Chief and, from there, it was sent down to Internal
 2 Affairs, and then it was assigned to an Alert Team
 3 who did a preliminary and then directly assigned to
 4 me in December.
 5 **Q So you said the IA team gathered daily details,**
 6 **activity logs. Anything else?**
 7 A We conducted interviews and received paperwork and
 8 payroll, etcetera, from some of the other places
 9 that he worked.
 10 **Q You are referring to St. John's and Allen Academy?**
 11 A Correct.
 12 **Q We have testimony here today about-- well, did you**
 13 **get the time sheets? Strike that.**
 14 **Did you get time records or**
 15 **payroll records from the Detroit Police Department**
 16 **as well?**
 17 A Yes, ma'am.
 18 **Q Personnel records?**
 19 A Personnel meaning what type of records?
 20 **Q His personnel file.**
 21 A No, ma'am, I did not.
 22 **Q Any desk blotters or work time reports, anything**
 23 **like that?**
 24 A Activity logs and the daily details.
 25 **Q Did you follow the criminal trial?**

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1 A Of the City of Detroit in general.
 2 **Q So any City of Detroit employee?**
 3 A Correct.
 4 **Q Do you know Jerome Collins?**
 5 A Through my investigation, yes.
 6 **Q What were you tasked to investigate?**
 7 A Possible time fraud by Mr. Collins or Officer
 8 Collins.
 9 **Q As it relates to the investigation, when were you**
 10 **assigned the investigation, sir?**
 11 A I was actually given the assignment December 10,
 12 2009.
 13 MR. GOLDPAUGH: I'm sorry,
 14 could you repeat that date, Sergeant?
 15 THE WITNESS: It would be
 16 December 10, 2009.
 17 MR. GOLDPAUGH: Thank you.
 18 **Q (By Ms. Jones) What did you do in furtherance of**
 19 **your investigation? Did you do interviews, document**
 20 **gathering, or what did you do?**
 21 A The Internal Affairs team, we were tasked to try to
 22 get documentation of activity logs, daily details,
 23 also do interviews of witnesses.
 24 **Q What triggered this investigation?**
 25 A From my understanding, a letter was sent to the

1 A Yes, ma'am.
 2 **Q So you indicated a letter initiated this, that**
 3 **letter to Warren Evans?**
 4 A Yes, ma'am.
 5 **Q Who did you interview?**
 6 A For the Department or--
 7 **Q Who did your team interview? Because I know you**
 8 **didn't conduct all the interviews.**
 9 A Commander Dolunt, at the time, Commander Moore,
 10 Lieutenant Williams, I think Lieutenant Justine
 11 Coleman (phonetic), some of the officers in the
 12 Community Relations I can't recall off the top of my
 13 head.
 14 **Q Do you have a copy of your report nearby?**
 15 A Yes, ma'am.
 16 **Q Can you refer to your report to refresh your memory,**
 17 **please?**
 18 A Yes, ma'am. It would be Officer Rios, Officer
 19 Hawkins, Officer Burt, Officer Robbins, as I
 20 mentioned, Lieutenant Williams, Commander Dolunt,
 21 Lieutenant Coleman, Officer Curtis, also former
 22 Chief Godbee.
 23 We also conducted interviews
 24 with Mr. Passage (phonetic), Mr. Rogers.
 25 **Q Who are they?**

33 (Pages 155 to 158)

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1 A Mr. Passage and Mr. Rogers were part of St. John's
2 Hospital.

3 Q Okay.

4 A Also Ms. Collins.

5 Q Who is that?

6 A Officer Collins' wife.

7 Q Anyone else?

8 A Not on my report.

9 Q Do you recall speaking to a Sergeant Rodney Cox?

10 A I personally did not speak with Mr. Cox, but the
11 Internal Affairs team did.

12 Q Was that to find out if he had permission to get--

13 MR. GOLDPAUGH: I'm going to
14 object to what it was about. He didn't talk to him.
15 I'm going to object to what Rodney Cox may or may
16 not have said.

17 MS. JONES: This is the officer
18 in charge of the investigation.

19 MR. GOLDPAUGH: And he
20 testified he did not talk to him. So how does he
21 know what Rodney Cox said to him? I have no
22 information with respect to anything with Rodney Cox
23 in this particular matter.

24 He is not on a witness list,
25 and he is not in any type of situation here where he

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1 can come in and testify as to the facts here.

2 MS. JONES: Counsel, if you
3 will refer to page two of the investigation report--

4 MR. GOLDPAUGH: I don't
5 really-- excuse my bluntness-- care about the
6 investigator's report. He has testified he did not
7 talk to the man. I'm objecting.

8 MS. JONES: The investigator
9 can speak to what took place. He is the officer in
10 charge of the case. He can speak to what took place
11 in his investigation.

12 MR. GOLDPAUGH: And I have no
13 objections. He said, and somebody talked to him. I
14 didn't object to that. What he said was I did not.

15 Her next question was what did
16 Rodney Cox say? That is my objection.

17 COMMANDER ENNIS: Sustained.

18 Q (By Ms. Jones) At some point in time, did you find
19 out that Officer Collins did not have permission for
20 outside employment?

21 MR. GOLDPAUGH: Object,
22 hearsay.

23 MS. JONES: It's part of his
24 investigation.

25 MR. GOLDPAUGH: Object,

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1 hearsay, unless I know who he got it from. Because
2 if he says he got it from Rodney Cox through
3 somebody else, that is objectionable.

4 If he says that one of those
5 individuals that he questioned stated that, then we
6 have that and it's been admitted. That is what my
7 objection is.

8 MS. JONES: Part of his
9 investigation was to find out if there was
10 permission for outside employment.

11 MR. GOLDPAUGH: Excuse me--

12 MS. JONES: You are not
13 allowing me to put in what Rodney Cox--

14 MR. GOLDPAUGH: Excuse me, that
15 was not what part of his investigation was when he
16 initiated that.

17 COMMANDER ENNIS: Counselor.

18 MS. JONES: You are not
19 allowing me to make my response.

20 COMMANDER ENNIS: Hold on,
21 let's stop. Each of you have the opportunity to
22 speak and finish your thoughts before the other one
23 interrupts or begins. So let's maintain some
24 decorum.

25 MR. GOLDPAUGH: I apologize.

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1 COMMANDER ENNIS: Let her
2 finish, and then you can respond.

3 MS. JONES: The charges before
4 you are about overlapping time as to St. John's,
5 Allen Academy and the Detroit Police Department. If
6 he had permission to be at one or the other, then we
7 wouldn't have I believe it's the first charge, it
8 might be even the second charge.

9 We wouldn't have the charges
10 before you. This is the officer in charge of the
11 investigation. They work in a team. He can speak
12 to what his team did and what information they
13 gathered pertinent to those charges that are before
14 you.

15 MR. GOLDPAUGH: May I respond?

16 COMMANDER ENNIS: Sure.

17 MR. GOLDPAUGH: The sergeant
18 stated that he was assigned the criminal
19 investigation into the time fraud. That is what he
20 was investigating. He was not, at the time that he
21 was assigned to this case, dealing with outside
22 employment or any other matters.

23 He was assigned to doing
24 criminal investigation with respect to a time fraud
25 claim. That is what he was assigned to. It came

34 (Pages 159 to 162)

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1 through channels and, subsequently, he did certain
2 things. I have not objected to any of those things.

3 The question was we have gotten
4 to the point where he talked to certain people.
5 Then one of the questions was, did you talk to
6 Sergeant Rodney Cox? He said no. The inquiry as to
7 what he learned through Sergeant Cox ends at that
8 point in time for two reasons.

9 One is I don't have any
10 information from a Garrity interview of Rodney Cox,
11 number one. Number two, he is not on any of our
12 witness lists, and that is why I said I don't really
13 care what is in the investigator's report.

14 Number three, he has no
15 personal knowledge of what Rodney Cox stated. So
16 moving along to the next one, because the Board
17 upheld that objection, the next question was did he,
18 meaning Officer Collins, have any permission for
19 outside employment?

20 It is true that is one of the
21 charges here. We don't disagree with that. But he
22 initially was not investigating that. So if it
23 turns out, well, I learned it, well, then how did he
24 learn it during his portion of the investigation
25 when he was the officer in charge of the case?

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1 Because we know that Lieutenant
2 Walton, who the testimony is going to show, and that
3 was her opening statement, took it over at some
4 point in time and became the officer in charge of
5 the case. Therefore, anything he learned was as
6 part of the criminal investigation.

7 That is why if you tell me I
8 heard it from somebody else who has already come in
9 and testified they didn't have it from me, that's
10 fine, but how do we know what Rodney Cox said or how
11 he has determined that? That's my objection as to
12 did you learn from somebody I told him he didn't
13 have permission.

14 MS. JONES: I will defer to the
15 Board.

16 COMMANDER ENNIS: Let me ask a
17 question just for clarity's sake. Your position is
18 that Internal Affairs works as a team.

19 MS. JONES: They work as a
20 team.

21 COMMANDER ENNIS: The sergeant,
22 just like a lot of squads within the Department,
23 work as teams in doing investigations.

24 MS. JONES: In fact he
25 testified the IA team collected daily details,

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1 activity logs, conducted interviews, received
2 paperwork, time records and so forth.

3 COMMANDER ENNIS: What your
4 question is is, as a result of working as a team,
5 did you get additional information? Is that the
6 question you are asking him?

7 MS. JONES: Did he get any
8 information regarding permission for outside
9 employment?

10 COMMANDER ENNIS: Your
11 objection is based on?

12 MR. GOLDPAUGH: First of all,
13 that wasn't your question. The question was, did he
14 get permission for outside employment? That was the
15 question.

16 COMMANDER ENNIS: Meaning did
17 Officer Collins have permission.

18 MR. GOLDPAUGH: The question
19 was did he learn that Officer Collins did not get
20 permission for outside employment when he has
21 already testified as to who he interviewed. So the
22 question begs the choice of, well, how did you learn
23 it?

24 Did somebody that you talked to
25 who has testified say no, I didn't? Our position is

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1 that he had this permission, but that's another
2 question. Just because someone didn't come in here
3 and say I didn't give it to him, that's fine, and we
4 know we have certain channels to go through.

5 We have had testimony from
6 Commander Dolunt, Commander Moore and from Commander
7 Motley that, no, they never gave him permission.
8 But now we are speculating because somebody says,
9 well, I didn't give him permission. So what? Who
10 cares?

11 That is the problem I have with
12 this. We know what the procedure is. We know what
13 the situation is.

14 MS. JONES: If it is their
15 position that they had permission, they have an
16 opportunity, after the Department finishes their
17 case, to present witnesses to show that. However,
18 the officer in charge of the case can speak to his
19 investigation, what was done under his
20 investigation.

21 MR. GOLDPAUGH: And it's very
22 simple. All he has to do is say, did I go through
23 the records to see if there was a request for
24 outside employment, simple as that. Did he do that?
25 I don't know. Because that is the subject she has

35 (Pages 163 to 166)

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1 now brought up. We are not talking about the
2 criminal investigation.

3 You take it for what it's
4 worth. If there is nothing there, you do what
5 you've got to do. But you can't guess around that
6 because somebody said he didn't have permission. It
7 doesn't make any difference.

8 See, she is trying to shift the
9 burden. It is our burden to defend the case. It is
10 her burden to prove the case. How does she prove
11 the case? By showing that everything is in order,
12 that's all.

13 COMMANDER ENNIS: Anything
14 else?

15 MS. JONES: No.

16 COMMANDER ENNIS: Overruled.

17 Go ahead.

18 Q (By Ms. Jones) Sergeant, someone from your team
19 learned that Officer Collins did not have permission
20 to work outside employment?

21 A Yes.

22 Q That was for what years, sir?

23 A I would have to refer again to my report. It was
24 learned that he did not have approval for 2008 or
25 2009 to work outside employment.

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1 A Yes.

2 MS. JONES: I am going to bring
3 to your attention a sampling of those activity logs.
4 Counsel, April 2009. Approaching the witness.

5 Q (By Ms. Jones) Sir, I have just handed you some
6 documents that purport to be Detroit Police
7 Department activity logs. You have them in your
8 hands. Is that what you are looking at?

9 A It appears to be activity logs.

10 Q What month is that for?

11 A It appears to be for--

12 MR. GOLDPAUGH: I didn't mean
13 to cut the witness off, but you said a number of
14 documents. Can you tell me how many he is holding?

15 MS. JONES: April of 2009. I
16 don't know how many there are.

17 MR. GOLDPAUGH: I just was
18 wondering because there are--

19 Q (By Ms. Jones) How many documents do you have, sir?

20 A I'm counting nine documents from April.

21 Q April 2009?

22 A Correct.

23 Q Are they for Jerome Collins?

24 A His name appears on each of the documents.

25 Q There is a signature on each of the documents?

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1 Q Did you also interview anyone else?

2 A I sat in on--

3 MR. GOLDPAUGH: Objection. The
4 question was did he interview anyone.

5 Q (By Ms. Jones) Did your team interview anyone else
6 in relation to Jerome Collins?

7 A Chief Godbee.

8 Q What about Mattie Lewis?

9 A I sat in on the investigative subpoena, but I did
10 not interview her.

11 Q Did you interview anyone from the Allen Academy?
12 I'm sorry, let me rephrase that so I don't get
13 objected to. Did you or anyone from your team
14 interview anyone from Allen Academy?

15 A Yes.

16 Q Who would that have been?

17 A Ms. Burrell (phonetic).

18 Q Did you or anyone from your team interview Joyce
19 Motley?

20 A Yes.

21 Q Who is Stacey Collins?

22 A At the time, I don't know about now, but Ms. Collins
23 was Jerome's wife, Officer Collins' wife.

24 Q Of the documents that you or your team obtained,
25 part of those were activity logs. Correct?

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1 A There is a signature affixed to that.

2 Q Are those documents also signed by a supervisor?

3 A Most of them are, yes.

4 Q What is the supervisor's name whose signature is
5 affixed?

6 A Sergeant Mattie Lewis.

7 Q What shift is he working or scheduled to work there?

8 A Most of them look like 12:00 p.m. to 8:00 p.m.

9 COMMANDER ENNIS: Excuse me,
10 but just for clarity for the record, I have nine
11 activity logs. Can you give me the dates of each of
12 the logs so we can have it on the record?

13 THE WITNESS: Yes, sir.

14 COMMANDER ENNIS: Also give me
15 the names of whoever the officers are who are listed
16 on the document.

17 MS. JONES: Okay.

18 COMMANDER ENNIS: And you also
19 referenced not having a supervisor's signature for
20 some of those?

21 THE WITNESS: Correct.

22 COMMANDER ENNIS: Can you give
23 that information as you reference each log?

24 Q (By Ms. Jones) Per the Board's instructions, take
25 the first document of the April package.

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1 A April 20, 2009, Jerome Collins, supervisor's name is
 2 Sergeant Mattie Lewis. The time would be 12:00 p.m.
 3 to 8:00 p.m.
 4 April 21, 2009, Jerome Collins,
 5 12:00 p.m. to 8:00 p.m.
 6 MR. GOLDPAUGH: I'm sorry,
 7 could you repeat that date again? I apologize,
 8 Sergeant. The 21st did you say?
 9 THE WITNESS: Correct.
 10 MR. GOLDPAUGH: Thank you.
 11 THE WITNESS: That would be
 12 Sergeant Mattie Lewis also. April 22, 2009,
 13 12:00 p.m. to 8:00 p.m., Officer Collins, the
 14 supervisor would be Sergeant Mattie Lewis.
 15 April 23, 2009, 12:00 p.m. to
 16 8:00 p.m., Jerome Collins, supervisor Mattie Lewis.
 17 April 24, 2009, 12:00 p.m. to 8:00 p.m., Officer
 18 Collins, and Sergeant Mattie Lewis is the
 19 supervisor.
 20 April 27, 2009, 12:00 p.m. to
 21 8:00 p.m., Officer Collins, Sergeant Mattie Lewis as
 22 the supervisor. April 28, 2009, 3:00 p.m. to
 23 11:00 p.m., Officer Collins, and there is no
 24 supervisor's signature.
 25 April 29, 2009, 12:00 p.m. to

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1 8:00 p.m., Officer Collins, Sergeant Lewis as the
 2 supervisor. April 30, 2009, 12:00 p.m. to
 3 8:00 p.m., Officer Collins and Sergeant Mattie Lewis
 4 as the supervisor.
 5 MS. JONES: I have two more to
 6 show him, and I'm going to hand you the packet.
 7 Counsel, I'm going to refer him to the January 5 and
 8 September 2.
 9 COMMANDER ENNIS: What year is
 10 it?
 11 MS. JONES: 2009.
 12 Q (By Ms. Jones) Sir, on the April ones that you
 13 spoke about, are all of those the 12:00 to 8:00
 14 shift?
 15 A No.
 16 Q Can you tell us which ones are not 12:00 to 8:00?
 17 A April 28, 2009, 3:00 p.m. to 11:00 p.m.
 18 Q Any others?
 19 A No.
 20 MS. JONES: So all the rest
 21 were 12:00 to 8:00. I am going to refer you to the
 22 January 5. Did you find it, John?
 23 MR. GOLDPAUGH: I'm still
 24 looking for it.
 25 MS. JONES: Off the record for

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1 a minute while he locates his.
 2 (At 2:22 p.m., off the record)
 3 (At 2:24 p.m., back on the
 4 record)
 5 Q (By Ms. Jones) Sir, can you tell me what shift is
 6 on the January 5, 2009?
 7 A January 5, 2009 for Officer Collins is 11:00 a.m. to
 8 7:00 p.m.
 9 Q Now, look at the September 2, 2009. What is the
 10 shift of that?
 11 A September 2, 2009 for Officer Collins, 1:00 p.m. to
 12 9:00 p.m.
 13 Q So his shift varied from time to time. Correct?
 14 A Yes.
 15 Q You indicated you got time records also from
 16 St. John's and Allen Academy. Correct?
 17 A Yes.
 18 Q You or your team?
 19 A Yes.
 20 Q Did you or your team also find information about a
 21 center in Canton, Michigan?
 22 A Yes.
 23 Q What was located there?
 24 A My understanding it was a basketball, slash, sports
 25 complex.

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1 Q Who was in charge of that complex or owned that
 2 complex if you know?
 3 A The Collins.
 4 Q When you say the Collins, you are referring to
 5 Officer Collins and his wife?
 6 A Correct.
 7 Q Do you know any information about the PAL program?
 8 Have you ever worked it?
 9 A No, ma'am.
 10 Q In your investigation, did you find out information
 11 about the football and basketball leagues that
 12 Collins was in charge of?
 13 A Yes, ma'am.
 14 Q What did you find out there?
 15 A He was coaching a youth football team. I don't
 16 recall the name.
 17 Q Do you recall where the practice sessions took
 18 place?
 19 A Huntington Woods.
 20 Q Where did the games take place?
 21 A Huntington Woods, and I do recall some place in
 22 Flint.
 23 Q As it relates to the outside employment, St. John's
 24 and Allen Academy, at some point in gathering the
 25 information, was there a comparison done of the

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1 information gathered?
 2 A Yes, ma'am.
 3 Q What was that comparison for?
 4 A The overlap between Officer Collins' working hours
 5 for the Detroit Police Department, Allen Academy and
 6 St. John's Hospital.
 7 Q Part of your team-- and I know she is going to
 8 testify after you. Part of your team also created
 9 charts showing the overlap. Correct?
 10 A Yes.
 11 Q We have entered that as Exhibit No. 7. At some
 12 point, did you seek a warrant for criminal activity?
 13 A Yes.
 14 Q What was the warrant for?
 15 A Can I refer to make it exact?
 16 Q Sure.
 17 A Investigator's Report 10058564 for Larceny by False
 18 Pretenses Over \$1,000 and Misconduct in Office.
 19 Q Going back, when you gathered information that
 20 related to St. John's, what was his position at
 21 St. John's?
 22 A Security officer.
 23 Q What was his position at Allen Academy?
 24 A Truancy officer during the day and security officer
 25 on a midnight shift.

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1 Q So he worked DPD generally during the day or
 2 afternoon, 12:00 to 8:00--
 3 MR. GOLDPAUGH: Objection,
 4 leading.
 5 Q (By Ms. Jones) Can you explain the shifts again for
 6 me? Generally, what were those shifts on the
 7 activity log?
 8 A Eleven to 7:00, 12:00 to 8:00, and I did see one
 9 1:00 to 9:00.
 10 Q Do you know what his hours were for Allen Academy?
 11 A Truancy officer during the day, no specific hours
 12 that I have, and security guard or security officer
 13 during a midnight shift of some sort.
 14 Q As it relates to St. John's, do you know what the
 15 hours were?
 16 A Normally, his hours would be in the morning. I
 17 don't have the sheets in front of me, but if I can
 18 recall, I think it would be a 6:00 to 2:00 shift or
 19 a 7:00--
 20 MS. JONES: Let me just grab
 21 the chart. May I have Exhibit No. 7, please?
 22 Q (By Ms. Jones) Referring you to Exhibit No. 7, you
 23 did not create that document, did you?
 24 A No, ma'am.
 25 Q A member of your team did?

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1 A Yes, ma'am.
 2 Q Thank you. If you will look through it, maybe you
 3 can figure out the shift for St. John's.
 4 A Averaging shift, 7:00 a.m. until between 2:00 and
 5 2:30.
 6 Q So you sought a warrant, and the warrant was signed?
 7 A Yes, ma'am.
 8 Q A preliminary exam took place?
 9 A Yes, ma'am.
 10 Q And he was bound over to trial?
 11 A Yes, ma'am.
 12 Q A trial took place?
 13 A Yes, ma'am.
 14 Q He was found not guilty?
 15 A Correct.
 16 Q On all counts?
 17 A Yes, ma'am.
 18 MS. JONES: Pass the witness.
 19 CROSS-EXAMINATION
 20 BY MR. GOLDPAUGH:
 21 Q Sergeant, You indicated a warrant was sought, and a
 22 warrant was issued, and one of those was for
 23 Misconduct In Office, the ever popular catch-all.
 24 Is that correct?
 25 A Yes.

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1 Q He was acquitted on the Misconduct in Office charge.
 2 Is that correct?
 3 A Yes.
 4 Q He was also charged through your offices with or at
 5 least a warrant was sought for one count of Larceny
 6 by False Pretenses. Correct?
 7 A Yes.
 8 Q Do you know, of your own knowledge, what the false
 9 pretenses were supposedly to be? You understand
 10 false pretenses. Correct?
 11 A Please explain.
 12 Q You understand, under the law, what false pretenses
 13 means under the statute?
 14 A Can you explain it to me?
 15 Q Well, my question was if you knew. If you don't--
 16 it is some sort of a document or something along
 17 those lines, is that your understanding, to support
 18 the allegations that he obtained money in a wrongful
 19 manner?
 20 A In a wrongful manner, yes.
 21 Q By a presentation of some sort of a document. Is
 22 that correct?
 23 A Correct.
 24 Q And the documents-- because you sat through the
 25 trial and I did not for the exam-- were the activity

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1 logs. Is that correct?
 2 A Correct.
 3 Q So the jury found, beyond a reasonable doubt of
 4 course, that he-- it was a jury trial. Right?
 5 A Yes.
 6 Q Thank you. So the jury found that he was not guilty
 7 of the larceny by-- that there was any false
 8 documents. Is that correct?
 9 A Correct.
 10 Q Now, you were the officer in charge of the case
 11 initially. Correct?
 12 A Yes.
 13 Q Then there came a point in time, because of whatever
 14 reasons with your office, that Lieutenant Walton
 15 took over as the officer in charge. Is that
 16 correct?
 17 A I have no understanding of that.
 18 Q So as far as you are concerned, you are still the
 19 officer in charge of the case?
 20 A Correct.
 21 Q Good. This case came down through channels, and you
 22 received the assignment. Were you provided with the
 23 letter which has been admitted as exhibit number, I
 24 think it's 11 or 10, from a Ms. Rice?
 25 I could be wrong with the name,

1 A Correct.
 2 Q When you received the assignment, this was based on
 3 the letter from Ms. Jones. Correct?
 4 A The one I just--
 5 Q From Catherine Jones, not Attorney Jones. That is
 6 what triggered your investigation. Correct?
 7 A Yes.
 8 Q Were you informed at that point in time that
 9 Commander Dolunt had sent information down
 10 previously regarding alleged outside employment of
 11 Officer Collins?
 12 A No.
 13 Q You eventually contacted Mrs. Collins. Is that
 14 correct?
 15 A Correct.
 16 Q Did she admit to sending the phony letter?
 17 A No.
 18 Q I guess my question is-- because we have heard
 19 testimony regarding the Canton situation here, and
 20 you have testified that you went and did some
 21 checking regarding the situation out in Canton and
 22 found out who owned things-- what put you in that
 23 direction?
 24 A Information.
 25 Q From whom?

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1 but were you provided, as part of your
 2 investigation, with that letter, Ms. Catherine
 3 Jones?
 4 A Yes.
 5 Q You were, and did you follow up by talking to that
 6 young lady?
 7 A I did a follow-up. I could not locate a Ms. Jones.
 8 Q So in other words, this letter that was sent by a
 9 Ms. Jones, you were never able to find Ms. Jones.
 10 Would that be a fair statement?
 11 A A fair statement?
 12 Q Is it a fair statement you were never able to find
 13 her if in fact she existed?
 14 A I wasn't able to find her.
 15 Q So in other words, you don't even know if she
 16 exists, do you?
 17 A No, I do not.
 18 Q Thank you. You have been sitting here through the
 19 proceedings. When you were given the assignment,
 20 were you given any information regarding this
 21 previous anonymous letter that Commander Dolunt
 22 spoke to?
 23 A Which anonymous letter?
 24 Q Well, you have been sitting here for the
 25 proceedings. Correct?

1 A Mrs. Collins being one of them.
 2 Q So you talked to Mrs. Collins, and Mrs. Collins
 3 said, I didn't send this letter, but we own this
 4 business out there. Would that be a fair statement?
 5 A No, it's not a fair statement.
 6 Q How did you put Mr. and Mrs. Collins together on
 7 that location?
 8 A One of our team members from Internal Affairs--
 9 Q Who was that?
 10 A Sergeant Dietrich Lever knows about the basketball
 11 facility.
 12 Q Is that because his son plays out there more than
 13 likely, or did play at that time?
 14 A I don't know.
 15 Q So Dietrich Lever told you about that, and that's
 16 when you got ahold of Collins. Would that be a fair
 17 statement as to how that came about?
 18 A I already explained that we did receive the
 19 information. Sergeant Lever does know about the
 20 facility. We were able to speak with Mrs. Collins
 21 at the time. That let us know that there is a
 22 facility out there.
 23 Q If you know, were they estranged at the time?
 24 A I do not know.
 25 Q Now, I notice you have listed a number of

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1 individuals that you or your team spoke to by way of
2 Garrity interviews. That was the commander, the
3 deputy chief, Chief Godbee. You also spoke to now
4 retired Deputy Chief Motley. Is that correct?

5 A I didn't personally.

6 Q You or your team?

7 A Correct.

8 Q I notice there was no Garrity interview of Sergeant
9 Lewis. Is that correct?

10 A It was the investigative subpoena.

11 Q My question was, there was no Garrity interview of
12 Sergeant Lewis, was there?

13 A No.

14 Q Was that at the direction of the Prosecutor's Office
15 that you should not Garrity them?

16 A I don't recall anything like that.

17 Q Well, then why didn't you, as part of this
18 investigation, do a Garrity interview of Sergeant
19 Lewis?

20 A I have no reason.

21 Q You were the officer in charge of the case.
22 Correct, Sergeant?

23 A That is correct.

24 Q You would make determinations as to who you wanted
25 to interview to get to the root of the evil, so to

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1 speak. Correct?

2 A Correct.

3 Q Did you tell your supervisors, the next one I want
4 to talk to is Sergeant Lewis because she is the one
5 who signed all these activity logs? Is that
6 correct?

7 A It was done in the investigative subpoena.

8 Q That wasn't my question. My question was, why did
9 she have an investigative subpoena instead of you
10 asking her to come down under Garrity or ordering
11 her down under Garrity? It's as simple as that.

12 A I don't know.

13 Q Did you have a meeting with your supervisors? ✓

14 ✓ A I was informed by my direct-- I can't recall who--
15 but that we would have to go do an investigative
16 subpoena on her.

17 Q So that is why you didn't do it. I mean you did
18 know. You were told to do an investigative
19 subpoena. Correct?

20 A Correct.

21 Q So that is why you didn't do a Garrity interview.
22 Is that correct?

23 A A Garrity interview, to my understanding, a Garrity
24 would be for a departmental charge. This was a
25 criminal investigation.

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1 Q That's not my question, Sergeant. My question was
2 why didn't you do a Garrity interview? Your answer
3 was because you were told you had to do it under an
4 investigative subpoena. Isn't that correct?

5 MS. JONES: I believe he has
6 answered that.

7 MR. GOLDPAUGH: No, he hasn't.
8 I have asked him why he didn't do a Garrity
9 interview. It's a very simple answer. All he had
10 to do was say we're going to send her for an
11 investigative subpoena. He didn't say that. That's
12 all.

13 COMMANDER ENNIS: The objection
14 is overruled. Sarge, the simple question is, did
15 you not do the Garrity interview because you were
16 directed by your superiors not to do Garrity?

17 That's a yes or no.

18 THE WITNESS: Correct.

19 MR. GOLDPAUGH: Thank you.

20 Q (By Mr. Goldpaugh) At the time of the investigative
21 subpoena, which you sat in on along with Lieutenant
22 Walton-- is that correct?

23 A I would have to look. Lieutenant Walton was in
24 there.

25 Q I can show you a copy just to refresh your memory.

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1 I'm not trying to-- my information indicates that it
2 was Bob Donaldson and you, and you didn't ask any
3 questions, I'm not suggesting that, but that you
4 were in the investigative subpoena at the same time.

5 (Inaudible discussion between
6 Ms. Jones and Mr. Goldpaugh)

7 MR. GOLDPAUGH: May I approach?

8 COMMANDER ENNIS: Yes.

9 Q (By Mr. Goldpaugh) Looking at the cover sheet, does
10 that refresh your memory regarding--

11 A Yes.

12 Q Thank you. When was the date of that investigative
13 subpoena?

14 A March 4, 2010.

15 Q When did you submit the warrant request if you
16 recall?

17 A (No response)

18 Q Would it be a fair statement-- would April 16
19 refresh your memory, Sergeant?

20 A I don't know the date.

21 Q Would it be a fair statement that the warrant being
22 signed against Officer Collins would be some time in
23 April of 2010? Look at this time line prepared by
24 Ms. Jones and see if that refreshes your memory?

25 A April 16, 2010.

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1 Q Does that refresh your memory of approximately the
2 date? I'm not looking for the exact date, but it
3 was some time in April?
4 A Sure.
5 Q The investigative subpoena that you attended that
6 dealt with Officer Collins as part of your
7 investigation also included another officer. Isn't
8 that correct?
9 A Could you repeat that?
10 Q The investigative subpoena was not just for Officer
11 Collins, was it, or for a case dealing with Officer
12 Collins, was it?
13 Do you still have that in front
14 of you? It should be right on the cover sheet.
15 A In reference to?
16 Q Right.
17 A In reference to Officer Collins--
18 Q Don't read it. I'm just asking, was the
19 investigative subpoena that you attended, that
20 investigative subpoena was not only dealing with
21 Officer Collins, was it?
22 A No.
23 Q Who was it dealing with?
24 A It says Officer Collins and Borden.
25 Q Thank you. Now, had you been assigned to a criminal

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1 investigation with respect to Officer Borden?
2 A Me personally?
3 Q Yes.
4 A No.
5 Q Was there somebody on your team or a part of your
6 team that we keep talking about that was assigned to
7 a criminal investigation with respect to Officer
8 Borden if you know?
9 A I don't know.
10 Q Lieutenant Walton is your supervisor. Correct?
11 A Correct.
12 Q So she was the head of all the teams you had going.
13 Would that be a fair statement?
14 A Sure.
15 Q So is it safe to say, and you can correct me and say
16 no, it's not, that when you were there for the
17 purposes of your part of the investigation, the
18 criminal investigation into Officer Collins, you had
19 nothing to do with the Borden matter. Is that
20 correct?
21 A Correct.
22 Q As far as you know, you were just there sitting, and
23 you didn't ask any questions, I understand.
24 Lieutenant Walton, as part of that investigative
25 subpoena, was also there. Correct?

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1 A Correct.
2 Q Now, do you recall if during that investigation
3 Lieutenant Walton-- I'm not asking what she said or
4 didn't say. I'm just asking if you recall if she
5 was part of the question and answer procedure during
6 that incident?
7 A I would have to take a look at the transcript.
8 Q So you don't recall. Would that be a fair
9 statement?
10 A Correct.
11 Q Now, Sergeant, there came a point in time-- you did
12 not prepare the exhibit with respect to our
13 proceedings. This is Exhibit No. 7. Is that
14 correct?
15 A Correct.
16 Q You had nothing to do with the calculations. Is
17 that right?
18 A No.
19 Q You didn't do that. It was done at some point in
20 time. Do you know when Lieutenant Walton did that?
21 A No.
22 Q When you submitted your initial warrant request,
23 that was some time in, would it be a fair statement,
24 the middle of January of 2010 approximately?
25 A Correct.

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1 Q That was not part of your original warrant request,
2 was it?
3 A I don't know.
4 Q Well, you didn't prepare it. Right?
5 A Correct.
6 Q Your warrant request that you submitted back in
7 January of 2010 dealt with one count of Larceny by
8 False Pretenses and one count of Misconduct in
9 Office. Is that what you submitted?
10 A If I could take a look at my Investigator's Report,
11 I could tell you.
12 MR. GOLDPAUGH: Will you
13 stipulate that is what it was for?
14 MS. JONES: Yes.
15 MR. GOLDPAUGH: The Department
16 will just stipulate that is what the original
17 warrant request was for.
18 Q (By Mr. Goldpaugh) There was a preliminary
19 examination held in this matter, is that correct,
20 and you attended that?
21 A I don't recall.
22 Q You don't recall if you attended, but there was an
23 exam. Right?
24 A Yes.
25 Q At the end of the exam, Officer Lewis-- that exam

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1 was held. Right?

2 A Officer Lewis?

3 Q I'm sorry, I mean Officer Collins. That was held.
4 Correct? The exam was held?

5 MS. JONES: I believe he
6 answered that when I asked him if a preliminary exam
7 did take place.

8 MR. GOLDPAUGH: Okay, fine, no
9 problem.

10 Q (By Mr. Goldpaugh) Subsequently, Officer Collins,
11 based on other testimony, they added a count. Is
12 that correct, if you are aware of that?

13 A I would have to look at all this stuff again.

14 Q That's fine.

15 A If you would like to show it to me, I could--

16 Q No, that's fine, because we have admitted--

17 MS. JONES: Exhibit No. 12.

18 MR. GOLDPAUGH: Well, we have
19 admitted Exhibit No. 12, but I mean we know when it
20 originally started, so I just wanted to make this
21 record complete.

22 Q (By Mr. Goldpaugh) That is the acquittal that has
23 been admitted as Exhibit No. 12. That document
24 talks about three charges he was acquitted on.
25 Correct?

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1 A That's correct.

2 Q But you only issued a warrant on two. Isn't that
3 correct?

4 A That's correct.

5 Q So would it be a fair statement that some time
6 between your initial warrant request and the signing
7 of the warrant, the prosecutor added some more on
8 top?

9 A Correct.

10 Q That's all I wanted to know. Thank you. That third
11 count dealt with the alleged overlapping with
12 respect to Allen Academy. Correct?

13 A Overlapping of?

14 Q I mean they were claiming now that he was working at
15 all these jobs and, therefore, he was stealing from
16 Allen Academy as well. Isn't that correct?

17 A I don't know what--

18 Q The prosecutor's theory was.

19 A Correct.

20 MR. GOLDPAUGH: I appreciate
21 that. I don't think anybody knows what his theory
22 was sometimes. I apologize to Attorney Evelyn for
23 that comment.

24 Q (By Mr. Goldpaugh) The trial is over. You are
25 still the officer in charge of the case. Correct?

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1 A Correct.

2 Q During the trial or during the procedures, did you
3 receive any type of subpoena for documents regarding
4 initiative reports or anything like that?

5 A Did I receive any?

6 Q Right. I'm sorry, while you are going through that,
7 you didn't testify at the trial, did you?

8 A No.

9 Q Lieutenant Walton did. Isn't that correct?

10 A Correct.

11 Q Because she is the one who prepared the documents
12 and things like that?

13 A Correct.

14 Q So it was through her as opposed to you, the officer
15 in charge of the case, that all the exhibits were
16 admitted for the criminal proceedings. Would that

17 be a fair statement?

18 A The documents?

19 Q The documents, the activity logs, all those
20 documents. Would that be a fair statement?

21 A I don't understand the question.

22 Q Normally, and you have been in trials before, when
23 you collect documents, you are the one that gets up
24 on the stand and says I collected them, and they get
25 admitted. Right?

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1 You have done that as an
2 officer in charge whether you had any personal
3 knowledge of the criminal activity alleged of the
4 officer.

5 In this case, you are the one,
6 as the officer in charge of the case, who collected
7 everything, put it all together and so forth and so
8 on, but you didn't testify as to the collection of
9 those documents because it was through Lieutenant
10 Walton. Is that correct?

11 A As far as this document, yes.

12 Q In fact didn't they all come through her, the
13 activity logs that were admitted, the daily details,
14 because that is how she prepared this document? Is
15 that correct?

16 A She was able to prepare this document with the
17 activity logs, that's correct.

18 Q Sure, I understand. When you were sitting in the
19 trial, did you learn that there were these, I guess
20 for lack of a better term, initiative reports that
21 had been requested by defense Attorney Evelyn?

22 A I remember him mentioning something about it, but I
23 can't recall what was said.

24 Q Do you know, of your own knowledge, whether those
25 initiative reports were ever turned over to the

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